

David Morris Clayman / דוד משה קליימן / אדם דוד קליימן, *Pro se*

**APPENDIX: SECOND AMENDED COMPLAINT WITH APPENDICES**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

**David Morris Clayman** ( / אדם דוד /  
דוד משה קליימן),  
Plaintiffs,

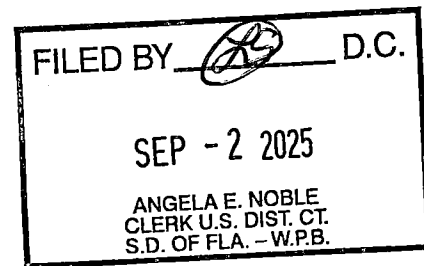
vs.

**SCOTT BESSENT**, in his official  
capacity as  
Secretary of the Treasury;  
**UNITED STATES OF  
AMERICA**;  
**CONGRESS OF THE UNITED  
STATES**;  
**JEROME H. POWELL**, in his  
official capacity as  
Chair of the Federal Reserve;  
**GENE L. DODARO**, in his official  
capacity as  
Comptroller General; and  
**DONALD J. TRUMP**, in his  
official capacity as  
Commander-in-Chief and President  
of the United States

**CASE NO. 9:25-CV-80890-WM**

**SECOND AMENDED COMPLAINT**

**APPENDICES**



**EXPEDITED HEARING REQUESTED**

**SECOND AMENDED COMPLAINT**

**COMES NOW** David Morris Clayman ( / דוד משה קליימן / אדם דוד), as the Plaintiff for all Jewish  
sectarian religious, American civic religious, and simply civic claims herein, including:

1       • A plea for an updated non-sectarian motto, at minimum one that doesn't use the sacred,  
2 unhyphenated form of G-d's Name

3       • True access to flexible self-pay FairPay / CashAlt bail or completely "cashless" bail  
4 nationwide, requiring jails and holding facilities everywhere in the United States to, if bail is  
5 required at all, ensure (a) that the detainee has the means to pay it (FairPay) and (b) permit and  
6 facilitate reasonable and speedy detainee access to a variety of convenient and common non-cash  
7 alternative (CashAlt) financial instruments accessible from their belongings, their phone, their  
8 wearable devices, or a secure computer terminal or device made available to detainees without  
9 undue frustration for the payment of "cash" bail.  
10

11       • A civic currency design overhaul (no further penny mintings, more durable and artistic  
12 plastic substrate, better themes less idolatrous of or focused on flawed dead Presidents)

13       • A civic currency retitling and motto tournament contest to make our daily currency name  
14 more meaningful and mission-oriented and maximally achieve compelling government interests  
15 in recurrent moral priming with every transaction we encounter (domestic or international)  
16 denominated in US currency – whether denominated in CALM, Trust, Seeds, Talents, or any  
17 other mission-oriented title better advancing compelling government interests without the  
18 Government arrogating the willy-nilly use of and unreligious destruction of my G-d's most sacred  
19 vernacular Name in physical media.  
20  
21

22       The RFRA core of this case parallels, in several important respects, the framework of New  
23 Doe Child No. 1 v. Congress of the United States, 891 F.3d 578, 591 (6th Cir. 2018), and New  
24 Doe Child No. 1 v. Congress, No. 5:16-cv-00059-BYP (N.D. Ohio). Although the Plaintiff was  
25 only very minimally included in that earlier litigation, this case provides a far more detailed  
26 presentation of the Plaintiff's particular circumstances as an American Jew. It also cures two  
27  
28

critical, yet easily remediable, defects noted by the Sixth Circuit in its erroneous denial of the earlier claims:

1. **False equivalence of payment forms.** The Sixth Circuit conflated legal-tender cash (Federal Reserve banknotes and coins, bearing the sacred inscription “In G-d We Trust”) with alternative, non-sacred payment instruments such as credit cards, debit cards, and checks.

2. **Mistaken assumption of legal tender liquidity, sufficiency, and fungibility.**  
The court wrongly assumed that all plaintiffs, including this Plaintiff, could revert to legal-tender cash whenever legally or situationally necessary, and overlooked all the conditions and situations in which there is no effective or legal substitute to legal tender or cash-per-se.

Those assumptions led to the additional error of minimizing the substantial burdens faced by the Plaintiff. In reality, the Plaintiff’s burdens are extensive, unavoidable, and inseparable from his religious status, as this complaint now enumerates in detail, for lack of usable fair access to 31 USC §5103 Legal Tender, which specifies that “United States coins and currency (including Federal reserve notes and circulating notes of Federal reserve banks and national banks) are legal tender for all debts, public charges, taxes, and dues.” I can’t force settlement of debts, public charges, taxes, and dues for lack of usable access to legal tender, and I and my corporation and associations can not economically accept from others such legal tender either, putting me and the entities I control in enormous tension with existing statutes.

Beyond RFRA, this case also implicates the Eighth Amendment’s prohibitions on “excessive bail” and “cruel and unusual punishments.” The Plaintiff’s religious belief prevents him from using sacred legal-tender cash, rendering him unable to satisfy bail demands that require payment exclusively in that form—even though his funds exist in alternative media (credit, debit, or check) that the government declines to accept. Under *Robinson v. California*, 370 U.S. 660

1 (1962), the State may not criminalize or detain a person based on a mere “status” or immutable  
2 “condition.” Yet Plaintiff’s detention risk flows directly from such a status or condition,  
3 including:  
4

5 (a) absolute poverty in relation to legal-tender requirements – in legal tender, the Plaintiff  
6 is among the poorest and most impoverished Americans alive (he can not circulate or accept even  
7 1¢ of legal tender, except to shuttle the same to lifesaving charities);  
8

9 (b) illiquidity of funds across payment media for lack of reliable and guaranteed  
10 facilitation of funds transfers and conversions while in custodial detention;

11 (c) non-fungibility of available funds into a government-mandated form;

12 (d) economic solitude in the absence of others to intercede; and

13 (e) all of the above, compounded by or originating in the Plaintiff’s religious status as an  
14 American Jew strictly unable to circulate sacred “In G-d We Trust” legal tender currency that is  
15 legally or situationally required periodically by entities like Federal, State, and Local  
16 Government.  
17

18 Thus, within the United States—the Plaintiff’s homeland and fatherland—any requirement of  
19 legal-tender payment alone without any alternatives reduces him to an effective state in that  
20 domain of absolute and crushing poverty, similar to those who have absolutely no resources or  
21 assets, notwithstanding his substantial resources in non-sacred forms. This places his liberty at  
22 risk in ways both constitutionally impermissible and religiously unconscionable.  
23

24 The pleading also enumerates a wide array of additional substantial burdens, any one of which,  
25 standing alone, should suffice to shift the burden of proof back to the Government to demonstrate  
26 that it is employing the least restrictive means—a showing it cannot make.  
27  
28

1 In addition to the RFRA claim, the Plaintiff raises numerous other claims tied to his  
2 exclusion—now spanning over 11 years—from participation in legal-tender and cash transactions  
3 within his own homeland. These include, for example, 1st Amended Free Exercise and  
4 Establishment Clause violation claims where the Government is taking the same position on the  
5 printing of G-d's Name on monetary instruments as the ancient Hasmonean Government that was  
6 expressly overruled by concerned Jewish Sages in the Talmud, and an impermissible Fifth  
7 Amendment “taking,” where assets have been rendered effectively frozen or restricted solely to  
8 charitable or lifesaving uses through the combined effect of government policy and Plaintiff’s  
9 compulsory religious beliefs.  
10  
11

12 The Plaintiff respectfully asks this Court to recognize that there must be a light at the end of this  
13 long and difficult tunnel, and to grant interim relief from the continuing civil and religious rights  
14 violations and substantial burdens that he, and any of those similarly situated, face not only in the  
15 Southern District of Florida but also throughout the United States in daily interactions with fellow  
16 citizens, residents, visitors, and counterparties who once, now, or will feed, clothe, shelter,  
17 educate, employ, engage, entertain, serve, indebt, discipline, transport, fund, and invest in him.  
18

19 This over 11 year exclusion became unavoidable in situations where cash or formal legal tender is  
20 demanded once, following a moment of religious epiphany, the Plaintiff realized that the Name of  
21 G-d wasn't hyphenated as it should be on US currency, and as such the Plaintiff could not in the  
22 shoes of a currency designer, Member of Congress, Treasury Secretary, President, or common  
23 citizen sign off on any American currency, and could thus no longer circulate sacred “In G-d We  
24 Trust” currency. At that point, all his held cash assets became instantly frozen, illiquid, and  
25 unusable in order to preserve the sanctity of the Divine Name, and as the Legislature and the  
26 Executive has refused and still refuses any form of religious accommodation, the Plaintiff needs  
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1 and asks for relief to be granted from the Judicial Branch.  
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## Table of Contents

IN THE UNITED STATES DISTRICT COURT	
FOR THE SOUTHERN DISTRICT OF FLORIDA	1
EXPEDITED HEARING REQUESTED	1
SECOND AMENDED COMPLAINT	1
Table of Contents	7
I. INTRODUCTION	10
A. The Core Religious Conflict	10
B. Relief Sought	11
II. JURISDICTION AND VENUE	13
III. PARTIES	13
A. Plaintiff	13
B. Defendants	14
IV. FACTUAL ALLEGATIONS	16
A. Sincere Religious Beliefs and Historical Foundation	16
B. Jewish Law and Currency Practices	19
C. Government Currency Destruction Practices	22
D. Coins	23
F. Substantial Burdens on Plaintiff	23
G. There is Often No Adequate or Legal Substitute for Legal Tender / Literal Cash	39
I. Exhaustive Detail on Pretrial Detainment for Lack of Legal Tender In Violation of Legal Presumed Innocence	40
1. Plaintiff's Prior Detention and Denial of Access to Cash Alternatives	40
2. Arbitrary and Inconsistent Bail Payment Rules	41
3. Practical Consequences	41
4. Widespread Problem of Cash-Only Bail	41
5. Technological and Institutional Alternatives (CashAlt)	41
6. Judicial and Governmental Responsibility	41
7. Plaintiff's Means and the Cash-Strict Catch-22	42
8. Broader Equal Protection Failures	42
9. System Seems Designed to Protect the Bail Bondsmen Industry, not the Freedom of Detainees in Pretrial Detention	43
J. Historical Context	44
K. Lessons from Israel	47
L. Jewish Involvement in U.S. Currency Management	48
V. LEGAL FRAMEWORK	49
A. RFRA Standard	49
B. Constitutional Standards	51
VI. CLAIMS FOR RELIEF	51
COUNT I - Violation of RFRA (42 U.S.C. §§ 2000bb et seq.)	51
COUNT II - Free Exercise Clause Violation	52
COUNT III - Establishment Clause Violation	54
COUNT IV - Takings Clause Violation	56
COUNT V - Right to Petition Government for Redress and Trust That They'll	

1	Actually Respond with Religious Protections	58
2	COUNT VI - Reasonable Pro Se Fee Request	58
3	COUNT VII - Penny Minting Ban and Currency Overhaul Under RFRA	60
4	COUNT VIII - CashAlt Payment Method Commitment or Clarification for Executive Order 14342 and Executive Order 14340 To Prevent 8th Amendment Violating Excessive Bail or Cruel and Unusual Punishment	62
5	VII. PROPOSED REMEDIES AND CURRENCY REFORM	65
6	A. Immediate Relief Options	65
7	B. Currency Decommissioning	68
8	C. Alternative Payment Methods	69
9	E. Additional Accommodations	71
10	F. Currency Naming Contest Proposal	72
11	G. Plastic Currency Transition	73
12	H. Presidential Candidacy Consideration	73
13	VIII. PRAYER FOR RELIEF	74
14	CERTIFICATE OF SERVICE	79
15	APPENDICES	80
16	Core Appendices	80
17	Additional Appendices	80
18	APPENDIX A: CULTURAL AND RELIGIOUS PRACTICES SURROUNDING SHAIMOS	80
19	Hyphenating the Name of G-d	80
20	Shaimos and Document Lifecycle	81
21	Religious Basis	81
22	APPENDIX B: JEWISH HISTORY AND TALMUDIC BASIS	83
23	Historical Context	83
24	Talmudic References	83
25	Key Principles Derived	83
26	Relevance to Plaintiff's Beliefs	83
27	APPENDIX C: Detailed Slides on Talmudic Tractate Rosh Hashanah 18B	85
28	APPENDIX D: "Why Write "G-d" Instead of "G-o-d"? by Yehuda Shurpin of Chabad.org	85
29	APPENDIX E: Article from Times of Israel, January 25, 2023: "Shas bill: Add 'In G-d we trust' to banknotes as 'talismans for economic success'"	86
30	APPENDIX F: DISCUSSION OF FUTURE POTENTIAL ARREST RISK	90
31	APPENDIX G: EXECUTIVE ORDER 14342 "TAKING STEPS TO END CASHLESS BAIL TO PROTECT AMERICANS"	98
32	APPENDIX H: EXECUTIVE ORDER 14340 "MEASURES TO END CASHLESS BAIL AND ENFORCE THE LAW IN THE DISTRICT OF COLUMBIA"	98
33	APPENDIX I: RELIGIOUS ACCOMMODATION RE MIAMI-DADE CASHLESS BUSINESS ORDINANCE (EMAIL)	98
34	APPENDIX J: BYLAWS OF DAVID CLAYMAN OF LIFESAVER LABS FOR PRECEDENT & PRESIDENT (Specifically the In G-d We Trust Cash Use Prohibition on Page 6, Point #6)	98
35	APPENDIX K: PROPOSAL FOR COMPLETE U.S. CURRENCY REDESIGN TO BETTER MEET COMPELLING GOVERNMENT INTERESTS	99
36	Currency Name Change Contest to Celebrate the U.S. 250th Anniversary	99
37	Switch to Durable Plastic, Variably Sized Currency	109
38	APPENDIX L: HONORING PRESIDENT ROOSEVELT (ROSEAVELT) WITH A PROPOSAL FOR	

1	APPENDIX L: HONORING PRESIDENT ROOSEVELT (ROSEAVELT) WITH A PROPOSAL FOR	
2	REVIVED AMERICAN SIMPLIFIED NUMBER AND SPELLING SYSTEM	114
3	APPENDIX M: 2015 Currency Renaming Proposal: Crime-fighting, Conscientious	
4	Capital: A Quarter-Millennial Currency re:christening (Naming) Contest	120
5	APPENDIX N: "Bail Reform and Public Safety: Evidence from 33 Cities." Brennan	
6	Center for Justice. August 15, 2024	121
7		
8		
9		
10		
11		
12		
13		
14		
15		
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17		
18		
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20		
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## I. INTRODUCTION

### A. The Core Religious Conflict

1. Plaintiff David Morris Clayman brings this pro se complaint under the Religious Freedom Restoration Act (RFRA), the First Amendment, and the Fifth Amendment to challenge a longstanding government practice: the printing (or minting) of the national motto, "In G-d We Trust," on U.S. currency and other government-issued documents like US Passports, and at the state level State Driver's Licenses and State Seals that get physically printed or stamped in full and are not safeguarded carefully and protected from unreligious destruction.

2. For Plaintiff and others who observe strict Jewish practices regarding the sanctity of G-d's Name, this practice imposes a substantial burden. Under common American Jewish custom and personal religious belief, G-d's unredacted, unhyphenated name must not be desecrated or discarded or defiled by being carried in degrading environments like bathrooms, yet the Government routinely prints the full Name of G-d on materials that are treated like any other type of paper, walked billions of times a day into spaces Jews consider spiritually degrading like bathrooms where the print name of G-d should not be taken, and the prints of G-d's full name are destined for very routine, daily unreligious bulk destruction and disposal. This conflict renders Plaintiff unable to participate in normal economic life with the only Government-endorsed legal tender that exists in the United States without compromising his faith.

3. The "sacred form" of G-d's vernacular English Name that I will refer to by that label from here on is the unhyphenated version with an "o" in the middle of "G-d" that is written here either not at all or as little as possible. You will only see the sacred forms (English and Hebrew) in the reproductions of the Talmudic Tractate Rosh Hashanah and Megillat Taanit in the slides inserted in the first appendix, and those pages if held or printed out in physical form (such as any kind of

paper) must be treated with extreme care and certifiably handed or mailed back to the Plaintiff at the end of this proceeding please, as a religiously and legally necessary courtesy.

## B. Relief Sought

4. Plaintiff respectfully seeks declaratory and injunctive relief to:

- a. Prevent the future printing or minting of currency bearing the unhyphenated Name of G-d and redesign the currency and motto or motto-name accordingly;
- b. Provide alternatives for religious objectors, including secular motto designs ideally promoted up to the very title of the currency, ideally with Apollo-mission-accelerated<sup>1</sup> modernized currency easily identifiable for those with disabilities like blindness or visual impairment under joint Court-ordered compliance with the outcomes of this case and *American Council for the Blind v Paulson* (525 F.3d 1256 (D.C. Cir. 2008));
- c. Reform cash bail systems and public services to permit no-fee or very, very low-fee payment alternatives, to prevent 8th Amendment cruel and unusual punishment solely via refusal of the jail and detention systems to accommodate alternative very-commonly-relied-on highly portable means of currency for "cash" bail payment, like checks, credit cards, and debit cards, and all other means of payment accepted by the US

<sup>1</sup> By "Apollo-mission accelerated", I specifically mean release in under 6 years, 10 months, and 8 days – the time it took from John F Kennedy's Rice University speech on September 12, 1962 to the Apollo 11 moon landing on July 20, 1969. It should not take more time than the time required to land a human on the moon to redesign and steadily reprint / remind our currency at full printing and minting capacity. Jews and the blind and visually-impaired should not have to wait more time than that for the fulfillment of relief. It is unconscionable that the blind and visually impaired have already waited , a policy project that was first declared by the American Council for the Blind (ACB) on July 7, 1972 and still is being slow-walked by the Treasury Department. Injunctive relief was granted to the ACB on October 3, 2008 by the District Court for the District of Columbia. As of the date of revision, the blind and visually impaired have been waiting 16 years, 10 months, and 23 days for relief. As of today, 16 years and 10 months later, no banknotes, including the \$1, \$5, \$10, \$20, \$50, and \$100 have been redesigned. Plaintiff asks for a hard deadline for currency redesign appropriate for Jews like me, the blind, and the visually impaired, firmly within the Apollo mission timeframe of 6 years, 10 months, and 8 days dating from the date of initial docket entry of this *Second Amended Complaint*.

Treasury for tax payment or by the Courts for certified copies of court records – going beyond brutish exclusive acceptance of physical legal tender by Court order;

d. Require the Government to make some flexible religious accommodation for the Plaintiff, others in similar circumstances, and current prisoners, with an alternative form or mix of legal tenders consistent with his and their religious practices in all private or public commercial settings, whether that means universal acceptance of debit cards, credit cards, FedNow, ACH, bank wire, Zelle and other common digital payment rails, including part-social payment rails like Venmo, or a modern Central Bank Digital Coin (CBDC), as studied by the Federal Reserve, and provide adequate and fair reasonable access to secure payment devices or terminals to effectuate such payments even in custodial settings, whether for bail, phone or video calls, or for commissary<sup>2</sup> and other secure uses;

e. Compensate for burdens suffered under the Fifth Amendment's Takings Clause and via RFRA statutory mechanisms.

5. This complaint also proposes a longer-term solution: the establishment of a creative national contest to select a new, pluralistic motto and currency title, aiming to unify Americans through shared civic religious values, not sectarian claims that "overshoot" on religiosity, complicating or burdening any American's use of American currency and American legal tender.

<sup>2</sup> The current horrible, indefensible, paradoxical Catch-22 limitations on prisoner payments access for "cash" bail and commissary are a reflection of the fact that our otherwise voter-eligible prisoner population often is prevented from voting in local, state, and federal elections due to a mix of retrograde anti-democratic anti-suffrage laws, disconnecting felons and other prisoners from civic rights and dialogue when they need it and often need active civic reeducation, civic reflection, civic religion (of which the greatest rite is the right to vote), and civic rehabilitation the most. The Plaintiff believes universal Constitutionally-guaranteed prisoner suffrage for US citizens above voting age, with no permissible exceptions, would prevent such gross abuse and secure just change, including motivating politicians and legislators to actually visit and talk to the jailed and imprisoned and understand their unique needs, but forcing a voting rights guarantee for prisoners is a topic for which I thankfully currently lack "case or controversy" particularized-harm standing.

## II. JURISDICTION AND VENUE

6. This Court has jurisdiction pursuant to:

- 28 U.S.C. § 1331 (federal question jurisdiction)
- 28 U.S.C. § 1346(a)(2) (claims against the United States)
- 28 U.S.C. § 1361 (mandamus)
- 42 U.S.C. § 2000bb-1(c) (RFRA)
- US Constitution, 1st Amendment, 5th Amendment & 8th Amendment

7. Venue is proper in the Southern District of Florida pursuant to 28 U.S.C. § 1391(b) and (e) because Plaintiff resides in this district at 7930 Palacio Del Mar Drive, Boca Raton, FL 33433-4148, and substantial events giving rise to this Complaint occurred here.

## III. PARTIES

### A. Plaintiff

8. **David Morris Clayman** is a resident of Boca Raton, Florida, and a practicing roughly Conservative Jew whose religious beliefs require the utmost care and respect for the sacred unhyphenated name of G-d, in vernacular, in its dominant sacred form in any language he learns ("Mon Di-ux!" (FR), "iDi-os mio!" (ES)), and of course also the expanded set of seven Holy Names in the tongue of Hebrew, including the holiest of all, the unpronounceable Tetragrammaton (in Hebrew letters, "Yud - Hay - Vav - Hay"). The Plaintiff is a business owner (*Lifesaver Labs Public Benefit Corporation*, a Delaware Public Benefit Corporation) and software engineer who is building mobile software to prevent sexual harm like sexual assault and weak or single-layer birth control choices causing unplanned pregnancy and highly avoidable abortions, is an investor who switches between concentrated equity bets and diversified index fund

1 strategies but religiously must try to avoid investments in American-cash-destroying banks or  
 2 indexes that hold them, and has lately started running for Commander-in-Chief, Precedent, and  
 3 President of the United States for 2028 and beyond, planning to run as part of a  
 4 Presidential/Precedential Trinity team of three anchored formally by one candidate who shares  
 5 power with two others. Please note the realization and struggles that precipitated and formed  
 6 this case far far predate his decision to run for Precedency, but are yet one more example of his  
 7 overwhelming frustration at being, like so many other Americans, relegated to the role of a  
 8 Non-Player Character (NPC) in American democracy for lack of ability to have his grievances  
 9 and needs on this and so many other important issues resolved through pleading with his  
 10 legislators or the Executive Branch, needing instead to resort to this complete religious rights  
 11 claim in the Courts for lack of relief from the political branches who have been joined in  
 12 opposition to this clear and convincing pleading.  
 13

14 9. Pursuant to the religious history of Talmudic Tractate Rosh Hashanah 18B, Plaintiff  
 15 refrains from the use of currency or documents of any kind superfluously bearing the  
 16 unhyphenated name of G-d, particularly when used as a central design element as we see on  
 17 the banknotes and coins of United States currency, due to religious obligations detailed in the  
 18 Talmudic Tractate Rosh Hashanah 18B4 and followed assiduously by his forebears, the  
 19 Hasmonean Jews in the time of the Maccabees after the Maccabean Revolt.  
 20

## 21 **B. Defendants**

22  
 23 10. **Scott Bessent:** Secretary of the Treasury, sued in his official capacity for overseeing the  
 24 printing, minting, destruction and desecration of currency pursuant to 31 U.S.C. § 5112, 31  
 25 U.S.C. § 5120. Service: c/o Office of the General Counsel, U.S. Department of the Treasury,  
 26 1500 Pennsylvania Avenue, NW, Washington, DC 20220.

27 11. **United States of America:** The federal government as a whole, responsible for  
 28 implementing and enforcing the challenged policies. Service: 500 E Broward Boulevard, Ft.

Lauderdale, FL 33394, and U.S. Department of Justice, 950 Pennsylvania Avenue, NW, Washington, DC 20530-0001.

12. **Senate and House of Representatives of the United States:** The legislative bodies responsible for enacting the statutory requirements regarding currency design and content. The Senate shall be served through the Office of Senate Legal Counsel (642 Hart Senate Office Building, Washington, DC 20510) and the House shall be served through the Office of the General Counsel of the House of Representatives (219 Cannon House Office Building, Washington, DC 20515). This case would have been much easier to handle if Senate and House members had reacted sensitively to this religious design concern 10 years ago when it was first brought to their attention but ignored (multiple times on multiple trips to DC). We would have had a 10 year head start, and any attempted redesign and reissuance of currency might have been completed by now.

13. **Jerome H. Powell:** Chair of the Board of Governors of the Federal Reserve, sued in his official capacity, responsible for determining currency fitness and overseeing its destruction and desecration under 31 CFR Part 100. Service: c/o Office of the Secretary, Board of Governors of the Federal Reserve System, 20th Street and Constitution Avenue, NW, Washington, DC 20551.

14. **Gene Louis Dodaro:** Comptroller General of the United States, sued in his official capacity, tasked with auditing currency cancellation, destruction, and desecration under 31 U.S.C. § 5120. Service: c/o Office of the General Counsel, U.S. Government Accountability Office (GAO), 441 G Street, NW, Washington, DC 20548.

15. **Donald John Trump,** President of the United States, is sued here in his official capacity in light of his very recent and highly relevant exercise of executive power through the August 25, 2025 Executive Order 14342 ("Taking Steps To End Cashless Bail To Protect Americans"). That Order applies maximum federal pressure against jurisdictions such as Illinois—where my sibling

1 resides and where I regularly or may travel—as well as chilling all other jurisdictions  
 2 contemplating the adoption of cashless bail.  
 3

## 4 **IV. FACTUAL ALLEGATIONS**

### 6 **A. Sincere Religious Beliefs and Historical Foundation**

8 16. Plaintiff adheres to the teachings of Tractate Rosh Hashanah 18B4 and Megillat Taanit.  
 9 **Please attempt to read in full and fully understand this chapter of Jewish religious history**  
 10 as disclosed in the inserted PDF slide presentation "Hasmonean History - Shaimos (i.e.  
 11 Protected Names of G-d) on BCE Debt Notes" before going any further. **Please treat these**  
 12 **pages that follow extremely carefully. They contain intact unhyphenated prints of G-d's**  
 13 **Holy Name, not just in sacred form in the English languages but also in the tongues of**  
 14 **Hebrew, which practically all religious Jews consider to be even holier and more sacred**  
 15 **than English, or any other language or dialect. If you have a print copy of this, the print**  
 16 **copy must be treated with the utmost respect and returned to the Plaintiff for religious**  
 17 **storage in a genizah (a temporary religious holding site for documents destined for**  
 18 **religious burial) and ultimately religious burial when this case closes.**  
 19

20 17. This chapter of history detailed in Talmudic Tractate Rosh Hashanah 18B4 and in  
 21 Megillat Tanit was so important to the Jewish people in Israel that there was a holiday on the  
 22 Jewish calendar on that day to celebrate the elimination of G-d's Name from debt notes, until  
 23 mourning the political assassination of Gedaliah the Governor 400 years earlier with a fast day  
 24 that most religious Jews still observe (the annual "Fast of Gedaliah") was ultimately deemed to  
 25 re-overweigh the importance of continuing to celebrate the elimination of G-d's Name from debt  
 26 contracts.

27 18. To simplify the history: if I had to compare this to US civic religious holidays, it would be  
 28 as if Presidents' Day, Flag Day, or St. Patrick's Day were originally celebrated on September

1 11th, until the World Trade Center attacks replaced the celebratory day with a major mourning  
 2 day that outweighs the original celebration and lasts millennia, until most Americans forget we  
 3 ever had the original holiday on that date. But that does not obviate the civic religious or  
 4 sectarian religious significance of these original celebratory days!

5  
 6 19. If this RFRA case succeeds, pending final legal success, I plan to revive the Hasmonean  
 7 Maccabean tradition and celebrate with my future family a minor new American or Jewish  
 8 American celebratory holiday on the day that the final judgment is rendered, which I deeply hope  
 9 will be decided substantially before and effectuated with orders and responsive draft designs no  
 10 later than July 4th, 2026 on the quarter-millennial celebration of American freedom.

11 20. In the case *New Doe Child No. 1 v. Congress of the U.S.*, 891 F.3d 578, 591 (6th Cir.  
 12 2018), the sincere religious belief of the Plaintiff was accepted and went unchallenged. In the  
 13 instant case, there has been no effort by the US Attorney to question the sincerity of my faith and  
 14 any such effort would be very swiftly knocked down.

15  
 16 21. For the sake of legal completeness, the Plaintiff wishes to point out that beyond being a  
 17 somewhat atypically logically consistent American Jew on the question of protecting the  
 18 vernacular Name of G-d in all physical non-digital media forms, he is also properly ordained as a  
 19 Universal Life Church (ULC)<sup>3</sup> Minister. He attained ULC ordination on September 1, 2014 after  
 20 realizing in August 2014 that he could not use United States cash any longer and might need to  
 21 challenge the machinery of the Government on its cash printing and coin minting practices.  
 22 Plaintiff sought ordination on the belief that formal legal clergy status as recognized under federal  
 23 law would help him exercise his independent religious conscience without having to dedicate  
 24 himself and divert his life for four long years of rabbinic study to attain rabbinic semichah  
 25  
 26

---

<sup>3</sup> The Plaintiff wishes the Universal Life Church had a legal division called the Universal Life Synagogue (ULS) that better matched the Plaintiff's religious identity, but while ULC aims to be maximally non-denominational, representing all faiths under preferred assembly language (church, synagogue, mosque, temple, etc.) is understandably a non-trivial lift.

(rabbinic ordination) and the complete ordination appropriate to extremely well-rounded all-purpose Jewish religious leadership. Plaintiff has a great deal of respect for those who finish rabbinic semichah and does not pretend to be anywhere near as well-trained as rabbis on general matters of Jewish law. However, the Plaintiff is sufficiently expert on this question of the protection of G-d's vernacular Name to press forward with this case as an individual citizen, as an American, as a Jew, as an American Jew, and as a ULC Minister almost solely focused on civic and civil religious questions under RFRA with a secular (worldly) foundation, such as previously civic religious major organ donor incentives to preserve life, and here civic religious currency reform. Previous case law all around the country consistently supports the full legal recognition of ULC ordination. ULC Ministry comes with only two core tenets, which the Plaintiff abides assiduously by:

- a. Do only that which is right.
- b. Every individual is free to practice their religion however they like as long as their actions do not impinge upon the rights or freedoms of others and are in accordance with the law.

22. Judaism, by comparison, has a much more exhaustive set of ritual and belief requirements. But to settle the question of whether I'm Jewish or not by any standard, the Plaintiff's mother is Jewish by Orthodox standards and the Plaintiff has followed the necessary Jewish rites. No one can reasonably question whether the Plaintiff is Jewish. While the Plaintiff like the majority of American Jews sometimes frankly has some doubts about the scientific existence of G-d in biblical form in our modern world, he has faith in G-d nonetheless and follows religious practices consistent with Conservative or Traditional Judaism. Plaintiff's religious belief operates on a Pascalian wager, and his belief grounds him and provides him with a tremendous sense of purpose and focus on preserving life and death.

## B. Jewish Law and Currency Practices

23. Plaintiff adheres to Jewish laws and customs, including the principle of avoiding the unnecessary destruction or desecration of sacred texts and names, of which there are seven holy names in Hebrew and, for the Plaintiff, one (G-d unhyphenated) in English and one sacred form in almost every other commonly spoken language the Plaintiff learns or translates to.

24. Under Jewish law, custom, and tradition, many Jews like the Plaintiff believe not just the Hebrew names but also the dominant name of G-d in languages like English must generally be hyphenated (e.g., "G-d") on secular documents to prevent the intact sacred name from being desecrated if mistreated or from getting diluted or treated superfluously. That belief is based on the following passage from Rosh Hashanah 18B4, which is explained again more patiently in the attached slide presentation:

מוֹתִיב רַב אֶחָא בַּר הוֹנָא: בְּתִלְתָּא בְּתַשְׁרִי בְּטִילַת אֲדָרְתָּא מִן שְׁטַרְיָא. שְׁגִזְרָה מַלְכוּת יוֹן גְּזָרָה שְׁלָא לְהַזְכִּיר שֵׁם שָׁמַיִם עַל פִּיהֶם, וְלִשְׁגָבְרָה מַלְכוּת חֲשִׁמוֹנַי וְנִצְחוֹם הִתְקִיבוּ לְשִׁיהוּ מִזְכִּירִין שֵׁם שָׁמַיִם אֲפִילוּ בְּשִׁטְרוֹת. וְכָה הָיוּ כּוֹתְבִים: בְּשָׁנָת כָּךְ וְכָה לְיוֹחָנָן כֹּהֵן גָּדוֹל לִלְ-עֻיּוֹן.

It is stated in *Megillat Ta'anit*: **On the third of Tishrei the ordinance requiring the mention of G-d's name in legal documents was abolished**, and on that day fasting is forbidden. **For the kingdom of Greece had issued a decree against the Jews forbidding them to mention the name of Heaven on their lips. When the Hasmonean kingdom became strong and defeated the Greeks, they instituted that people should mention the name of Heaven even in their legal documents. And therefore they would write: In year such and such of Yohanan the High Priest of the G-d [לִלְ-עֻיּוֹן] Most High.**

וְלִשְׁמֹעוּ חֲכָמִים בְּדִבְרֵי, אָמְרוּ: לְמַחֵר זֶה פּוֹרֵעַ אֶת חֻבּוֹ וְנִמְצָא שְׂטֵר מוֹטֵל בְּאַשְׁפָּה, וְכִיטְלוּם, וְאוֹתוֹ הַיּוֹם  
עָשָׂאוּהוּ יוֹם טוֹב. וְאִי סָלָקָא דְעֵתָךְ בְּטִלָּה מְגִילַת תְּעֵנִית — קִמְיִיתָא בְּטוּל, אַחֲרֵיכִיתָא מוֹסִיפִין?!

**And when the Sages heard about this they said: Tomorrow this one, the borrower, will  
repay his debt, the lender will no longer need to save the loan document, the document will  
be cast on a dunghill, and the name of Heaven written there will come to disgrace. And so  
they annulled the ordinance to mention G-d's name in documents, and they made that day  
into a Festival.**

Source:

[https://www.sefaria.org/Rosh\\_Hashanah.18b.15?lang=bi&with=all&lang2=en](https://www.sefaria.org/Rosh_Hashanah.18b.15?lang=bi&with=all&lang2=en)

25. While it is very common for American Jews to hyphenate the Name of G-d in their own writing practices, it is not common yet for American Jews to realize the logical extension is a need to protect United States currency from bathrooms and end-of-life careless destruction. The Plaintiff acknowledges his practices with currency are very rare currently among American Jews, possibly wholly singular, but whether typified and classified under Jewish law as a religious legal requirement, custom, or strict idiosyncratic chumra<sup>4</sup> ("a fence around the law"), these practices reflect the most logical extension of the underlying religious beliefs of hundreds of thousands or even millions of American Jewish "hyphenators" (of the Name of G-d) like me. Analogous civic religious protections can be seen in American law as applied to the proper recommended display

<sup>4</sup> A chumra is a "fence about the law", meaning any rigorous Jewish practice that goes beyond the established narrowmost understanding of what's necessary under Jewish law. Some chumras have become halakhic Jewish laws. For instance, anyone who takes the prohibition to not "boil a calf in its mother's milk" to mean that chicken meat (hens do not even produce milk and don't have calves) can not be consumed within X number of hours of drinking cow milk have taken on a chumra as law. Choosing to wait six hours instead of three between meat and milk consumption is a commonly passed-on minhag (family tradition) as well as a chumra for those who take such on beyond what they were taught by their nuclear family to be strictly necessary. It's worth mentioning that chicken meat can curiously be eaten under Jewish law with chicken eggs but not with cow milk, all under rabbinic extensions to this prohibition of not "boiling a calf in its mother's milk". In Jewish law not all rules need to make sense to us mortals to be considered valid and binding Orthodox law. These are some illustrations of chumras, minhags, and Halachic laws.

1 and disposal of the American flag under 18 U.S. Code §700, "Desecration of the flag of the  
 2 United States; penalties". and 4 U.S. Code §8 "Respect for flag". These codes require  
 3 ceremonial destruction of the flag when worn. Similarly, under Judaism, there are conventions  
 4 and religious requirements for respect and disposal for the Name of G-d (unlike the American  
 5 flag burning is strictly disallowed; ceremonial Jewish religious burial is permitted), and the  
 6 Government is not and most People in the United States are not cautiously abiding by those  
 7 strictures, making it difficult or typically impossible for Plaintiff Clayman to transact in cash with  
 8 them.  
 9

10 26. There is a religious question in Judaism whether the vernacular names of G-d must be  
 11 religiously protected as *Shaimos* and be hyphenated or otherwise abbreviated on secular  
 12 documents and documents that won't be cared for with religious burial and avoidance of unclean  
 13 surfaces or rooms (notably, being placed or falling on the floor or being walked into bathrooms).  
 14 The Plaintiff has attached a new appendix from Chabad.org by Rabbi Yehuda Shurpin titled  
 15 "Why write 'G-d' Instead Of 'G-O-D'?" In that appendix, you'll see that the consensus opinion as  
 16 summarized by him converges on protecting the Name of G-d in English vernacular out of  
 17 precaution, with many like me believing it's not just a precaution but necessary. The Plaintiff  
 18 follows the opinion that the vernacular names of G-d in their dominant, most sacred form – the  
 19 dominant form that native and second-language speakers anchor their understanding of G-d to  
 20 in that language – must be religiously protected. There are many who believe only the Hebrew  
 21 Names of G-d need to be protected. That's also a principled philosophical stance, but not the  
 22 most religiously tolerant or understanding, considering that Jews like me who can't speak, listen,  
 23 read, or write Hebrew fluently relate to G-d mostly and arguably often most meaningfully in our  
 24 vernaculars.  
 25

26 27. This belief is not "self-imposed". Plaintiff does not "choose" to abstain from currency out  
 27 of preference; his faith and understanding of Jewish law and legal custom prohibits use of the  
 28 unhyphenated Name, under the rulings of the Sages above in Hasmonean times. This is a

central belief of the Plaintiff that Plaintiff is forced to follow connected to the Third Commandment to not take the Name of G-d in vain and the prohibition on the erasure of G-d's Name, provisions that outrank almost all other religious requirements as fundamental to the sacred relationship we have, build, and acculturate to with G-d. Courts may not question the centrality of a belief under RFRA (*Burwell v. Hobby Lobby*).

### **C. Government Currency Destruction Practices**

28. The lifespan of banknotes is quite short, particularly from G-d's geological timescales. About 15% of all currency Americans deposit into banks gets destroyed as "unfit for circulation." The Federal Reserve destroyed about 136 million banknotes in 2022 alone—372,000 banknotes with G-d's Name shredded unceremoniously each day.

29. Currency lifespans:

- a. \$1 bills: 6.6 years
- b. \$5 bills: 4.7 years
- c. \$10 bills: 5.3 years
- d. \$20 bills: 7.8 years
- e. \$50 bills: 12.2 years
- f. \$100 bills: 22.9 years

30. About 70% of all "new" banknotes printed are just replacements for currency the Federal Reserve shreds daily. In a typical American lifespan of 77.5 years, the sacred name on a \$1 banknote would go through 11.7 "half-lives."

**31. It's even more painful from a Jewish religious continuity perspective that the Government relies on cash destruction machinery made by Giesecke & Devrient.** Giesecke & Devrient is a German firm with a shameful Nazi history and historical affiliation. They served the Axis Powers in World War II, helped industrialize currency printing in Hitler's Third Reich, trafficked in blood money as suppliers of Reichsmarks, and knowingly counterfeited

1 British banknotes in Operation Bernhard. This is the same company, I understand, that facilitates  
 2 the destruction of G-d's Name on US currency today in gross and obscene violation of my  
 3 understanding of the needs of Jewish custom.  
 4

#### 5 **D. Coins**

6  
 7 32. While coins last longer than banknotes, they are treated often even more disrespectfully  
 8 and carelessly—often ending up on floors, in dirt, or lost in couches. Almost no one adequately  
 9 respects the Name of G-d on pennies, nickels, or dimes.

#### 10 **E. Federal Reserve Inflation Programmatically Devalues The Sacred Name** 11 **of G-d**

12  
 13 33. **The Name of G-d should not lose over half its inflation-adjusted value over 50**  
 14 **years, with a stated Federal Reserve target of *diminishing the value of G-d's Name by 2%***  
 15 ***per annum*.** A quarter (25¢) whose value is guaranteed by the Name of G-d from 1986 has  
 16 fallen to an equivalent of 8.5¢ today. If currency bears G-d's Name, it should appreciate through  
 17 deflation or perfect monetary steadfast stability, not diminish through programmed inflation.  
 18

#### 19 **F. Substantial Burdens on Plaintiff**

20  
 21 34. Plaintiff has been unable to use or circulate cash currency since 2014 because of this.  
 22 Because non-Jews and most Jews don't yet protect G-d's Name on currency as strictly, the only  
 23 persons with whom Plaintiff can transact are astute currency collectors dealing with highly  
 24 collectible specimens or lifesaving organizations that convert cash into stochastically strongly  
 25 probabilistic or definite lives saved (under the overriding religious duty to preserve life).  
 26

27 35. In the Sixth Circuit case *New Doe Child No. 1 v. Congress of the U.S.*, 891 F.3d 578, 591  
 28 (6th Cir. 2018), the attorney representing the Plaintiff then did not attempt to exhaustively list the

many substantial burdens that the Plaintiff suffered as a result of this government policy of printing the vernacular sacred Name of G-d on banknotes and minting it on coins. The Plaintiff, as a religious Jew, was unique among those Plaintiffs both on the basis of his belief and also in that the Plaintiff, unlike the other Plaintiffs, completely abstained from any use of cash or coin for 11 plus years now, with no capability to switch to coin or cash when compelled by circumstances. As a result of not being presented with a full list of Plaintiff's substantial burdens, the Sixth Circuit and the Ohio Northern District Court erred in their belief that Plaintiff did not suffer substantial burdens under the meaning of RFRA law, given existing case precedents.

36. Plaintiff has experienced numerous hardships:

**a. Cash-Strict Legal Tender Bail Payment Policies Imperil Plaintiff's Legally Innocent / Presumed Innocent Pretrial Freedom**

The Plaintiff has experienced numerous hardships arising from cash-strict bail policies. Chief among them is the unconscionably prolonged detention imposed solely because the Plaintiff's sincere religious beliefs prohibit use of legal-tender banknotes, combined with jails' refusal to accept alternative forms of payment. Even a single day of such detention constitutes cruel and unusual punishment under *Robinson v. California*, 370 U.S. 660 (1962), and a substantial burden under RFRA.

This burden is examined in much greater detail with enormous specificity in Section I, "Exhaustive Detail on Pretrial Detainment for Lack of Legal Tender" below, supplemented by an Appendix, "Discussion of Potential Future Arrest Risk".

**b. Inability to Pay for Everyday Transactions:** Plaintiff is excluded from cash-only services like coin-operated laundromats, cash cover entry fee bars, cash cover entry social events like the Latin Dance events he would have loved to go to more often, and

1 cash-only street food, limiting his ability to participate in communal activities, infringing on  
2 his 1st Amendment Freedom of Association and interfering with his ability to travel freely  
3 to areas of the United States that are more cash-reliant, like Puerto Rico or other states  
4 and territories or more impoverished, unbanked, or more demographically elderly or very  
5 young areas of the country where cash use is still very heavy. As a former teacher in  
6 school systems that cater to a young demographic base of customers that are heavily  
7 cash-reliant, the Plaintiff was often unable to pay for subsidized faculty school lunch at the  
8 cash register because only cash was being accepted for payment.  
9

10 **c. Significant Added Surcharges:** Over 11 years, Plaintiff has paid over \$1,000 in  
11 religious belief surcharges—coffee shops charging 50¢ surcharges on credit transactions  
12 under \$10, gas stations offering 10¢/gallon cash discounts he can't use, skydiving  
13 companies charging \$200 cash but \$220 credit.  
14

15  
16 No Court has ever ruled before on whether cash-only surcharges ("**thousand papercut**  
17 **injuries**") constitute substantial burdens when they are shown to aggregate, be  
18 experienced, and be unavoidable, as they are alleged to be in this present case, and as  
19 the Government does not dispute the facts of.  
20

21 **d. Travel Cash Toll Risk and Remaining Public Transit Legal Tender / Cash Reliance:**

22 Plaintiff must plan road trips carefully to avoid cash-only tolls. On one trip from Ohio to  
23 Canada, his father had to pay a cash toll over Plaintiff's strenuous objections. Because of  
24 his inability to pay cash into the till, for a very long time riding on PalmTran was hell;  
25 Plaintiff hasn't attempted to ride PalmTran for over 6 years since before the introduction of  
26 the Paradise Pass in 2021, even though he's historically been extraordinarily committed to  
27 the civic virtues of public transit reliance, because of his quite terrible experiences getting  
28

1 stranded or inconvenienced in extremely awkward places for lack of cash methods of  
2 payment, and the awfully inconvenient methods PalmTran used to have for purchasing  
3 farecards without cash (back before Paradise Pass, it used to basically require a special 1  
4 hour+ trip to PalmTran headquarters). Both of these problems are getting substantially  
5 less difficult in the top 250 American cities by population to manage over time versus 2014  
6 when I first refrained from cash, with further and more widespread adoption and  
7 penetration of cashless payment methods, but it still requires more preplanning for me to  
8 get around than for anyone else who could flexibly switch to cash if, for instance, they  
9 enter a tollroad anywhere in the country that doesn't accept or partner with SunPass or if  
10 they hop onto a bus for which they don't yet have a local card-purchased prepaid transit  
11 card.  
12

13 **e. Emergency Preparedness Challenges:** Plaintiff cannot hold cash for natural disasters  
14 when electronic systems fail. Plaintiff lives in Florida currently, where hurricanes are an  
15 annual life-threatening phenomenon. How does this Court expect the Plaintiff to fend for  
16 himself when a hurricane hits Palm Beach County hard and electronic payment systems  
17 go down when steady access to funds is needed the most and lack of access to legal  
18 tender is most grave?  
19

20 **f. Privacy Invasion With No Escape:** Exclusive reliance on digital payments subjects all  
21 transactions to invasive diligent government and corporate surveillance and review  
22 stretching all the way back to 2014. Unlike others, because Plaintiff can not use cash  
23 Plaintiff can not and does not have the freedom to "live off the grid" without reverting to the  
24 most primitive barter, which is obviously a non-starter. Plaintiff cannot even buy condoms,  
25 lubricant, marijuana, or pregnancy tests without the federal, state, and local Government  
26 knowing or being able to pry into my life via any complaisant Court order or subpoena.  
27  
28

**g. Accumulation of Inert, Frozen Currency Barred from Recirculation:** Plaintiff

received \$1,485 in United States federal reserve banknote wedding gifts he could not use. His only justification for depositing was making an equivalent donation to life-saving charity under pikuach nefesh, the overriding Jewish religious obligation to preserve life, mirrored in the Plaintiff's understanding of American religion as the "lifesavers override".

**h. Disrupted Employment Opportunities:** Plaintiff cannot competitively work as a bank teller, Starbucks barista, Panera employee, waiter, street vendor, delivery driver, parking attendant, anything involving cashier duties, male stripper<sup>5</sup>, Federal Reserve employee, or serve on banking committees without imposing an undue burden on business operations unless I achieve currency reform change. Plaintiff has talked to managers at his local Starbucks about working as a barista; they say religious accommodation is likely impossible, given that any employee must and is expected to be free to shift into working any and all other roles behind the bar, including the cash register, for which it would be an undue burden on the business if I were to frictionally and insistently object to accepting cash from every customer who offers or can only pay in cash.

**i. Disrupted Childhood Experiences for Future Children and Painfully****Uncomfortable Substitute Teaching Classroom Experiences:**

Plaintiff cannot responsibly teach his future children about money by involving them in the circulation of current U.S. currency, which he views as part of an "early Hasmonean" cash system. His children could not operate something as simple as a lemonade stand or accept cash unless the proceeds were immediately donated to lifesaving charity, or unless life itself were at stake.

As a former teacher, Plaintiff also observed firsthand how prominently "In G-d We Trust" appears in elementary school currency handouts, creating discomfort when teaching

<sup>5</sup> Please forgive me for joking. Aside from this stripper reference, this complaint is deadly serious.

1 diverse groups of students. While working as a substitute teacher in Illinois,  
 2 Plaintiff—though a monotheist himself—was deeply uncomfortable instructing six- and  
 3 seven-year-olds, some of whom might be polytheists, atheists, or agnostics, to use  
 4 worksheets marked with the National Motto. He could not reasonably ask these children  
 5 or their parents whether the motto aligned with their beliefs, nor could he protect the  
 6 handouts from reuse once they had come into his custody, conflicting with his religious  
 7 impulse to safeguard the Name.  
 8

9 Plaintiff contends that sectarian, sacred-tinged teachings have no proper place in the  
 10 public school curriculum outside of a World Religions or U.S. Religions curricular context.  
 11 Indeed, the Government itself seems to tacitly acknowledge this: many of the Bureau of  
 12 Engraving and Printing's own children's storybooks on currency, distributed through the  
 13 U.S. Currency Education Program, conspicuously omit depictions of the motto<sup>6</sup>—likely to  
 14 avoid Establishment Clause challenges. Yet other government educational materials, such  
 15 as U.S. Mint Coin Classroom coloring pages, do feature it<sup>7</sup>, creating direct conflict for  
 16 teachers or substitute teachers like Plaintiff.  
 17

18 Plaintiff accepts that civic and civic religious education is a proper and important role for  
 19 public schools. But requiring teachers to direct young children to read, recite, and  
 20 internalize "In G-d We Trust" in the context of learning to count and appreciate money  
 21 crosses the line into sectarian instruction, in a manner that imposes "early Hasmonian"  
 22 practices on everyone in the United States population. For Plaintiff, this constitutes an  
 23 Establishment Clause and Free Exercise violation and a substantial burden on religious  
 24 exercise under RFRA. On at least three separate occasions in Illinois, Plaintiff was  
 25 required to deliver this exact "In G-d We Trust" currency counting lesson to kindergartners.  
 26

27  
 28 <sup>6</sup> [https://www.uscurrency.gov/sites/default/files/downloadable-materials/files/en/play-m  
 oney-coloring-sheets-en.pdf](https://www.uscurrency.gov/sites/default/files/downloadable-materials/files/en/play-money-coloring-sheets-en.pdf)

<sup>7</sup> <https://kids.usmint.gov/resources/coloring-pages>

1 Looking forward, he wishes to remain engaged in education—both when his own children  
2 attend elementary school and later in retirement—but he cannot in good conscience  
3 continue teaching lessons or assuming responsibility for lessons that force him to  
4 evangelize or promote the state-endorsed motto to impressionable children from pluralistic  
5 and undifferentiated backgrounds. Absent a secular revision of the motto or curriculum  
6 reform, Plaintiff is left with no way to comply with both his religious obligations and his  
7 once-and-future professional role as an educator.  
8

9 **j. Difficulty Tipping/Donating to Service Workers and the Needy:**

10 Plaintiff needs 2-3 minutes to tip via Zelle instead of 10 seconds with cash. That makes  
11 the kinetics and reaction speed donating to panhandlers or roadside sellers nearly  
12 kinetically impossible.

13 Many times driving to Aventura, FL I wanted to buy roses or other flowers for my now  
14 ex-wife from roadside vendors coming off the highway at the Ives Dairy or Hallandale  
15 Beach Boulevard exits. I couldn't ever buy her flowers that way because the transaction  
16 time required to buy flowers without cash was too high to fit within a red light cycle; it  
17 would have been irresponsible and a probable violation of law for me to hold up traffic  
18 trying to negotiate a Zelle or other digital cash transfer roadside.

19 This fairly severe and substantial burden interfering also with equal 1st Amendment  
20 freedom of association also manifests in more subtle yet deeply impactful ways. Just  
21 about a month or two ago, Plaintiff received a \$5.00 digital payment via Venmo from his  
22 brother-in-law, with the specific religious intention that Plaintiff donate the funds to a  
23 homeless/unhoused person upon reaching his destination, in observance of the Jewish  
24 tradition of giving to the needy. Upon arriving in Florida, Plaintiff encountered an  
25 apparently homeless individual outside a 7-Eleven and attempted to fulfill this mitzvah.  
26 However, the individual lacked access to Zelle or Venmo and was either unable or  
27  
28

1           unwilling to establish a digital payment account at that moment, claiming technical  
2           illiteracy. As a result, Plaintiff was unable to complete the donation.

3  
4           This incident underscores a broader and recurring burden: non-cash alternatives only  
5           function when both and all parties are equipped, able, willing, and have the time and  
6           commitment to use them. Plaintiff cannot compel others—especially vulnerable or  
7           marginalized individuals like the 2-3% of American households that are strictly  
8           legal-tender-cash only—to adopt or associate through these digital payment methods.  
9           This imposes a constraint not only on his religious practice but also on his freedom of  
10          association, as Plaintiff is functionally excluded from transacting with individuals and  
11          businesses that choose to only accept physical cash on the incorrect supposition that  
12          everyone can withdraw and use cash if they wish. Many in the United States, including  
13          those who are unbanked or digitally disconnected, are simply unable to participate in  
14          cashless exchanges.  
15

16  
17          Plaintiff has experienced increasing social and commercial isolation since he ceased  
18          using government-issued cash in 2014 for sincerely held religious reasons. Simple acts of  
19          generosity, such as donating to the homeless or offering tips, have become practically  
20          impossible within a reasonably short and spontaneous span of time. In the recent  
21          example, the unhoused man was deprived of a meal that day—not because Plaintiff  
22          lacked the funds or will to help, but because the Government's coercive cash-based motto  
23          policy arbitrarily severed the means of connection between Plaintiff and the recipient.  
24

25          **k. Inability to Walk Sinlessly into Bathrooms with Currency:** Like any Shaimos,  
26          Plaintiff must guard G-d's Name from bathrooms and any other places considered too  
27          filthy for the Name of G-d to be uttered or carried. He must leave wallets outside or  
28

1 "double wrap" cash in plastic bags, which is an impractical, unlivable requirement when  
2 we're dealing with currency.

3 I challenge you to try walking around town for a week with cash in your wallet or purse  
4 never allowing yourself to walk into any bathrooms, public or private, with that wallet or  
5 purse bearing sacred cash within. It quickly becomes deeply burdensome and  
6 unmanageable -- every time nature calls you have to try to find a safe place to store or  
7 stow your wallet or purse unattended or entrusted to a stranger until you're relieved. It's  
8 not a minor inconvenience; it becomes an unliveable duty to guard cash you're carrying  
9 from the dual threat of theft on one hand or spiritual defilement on the other.  
10

11 **I. Inability to Park in Cash-only Lots**

12  
13 Periodically I go to downtown Fort Lauderdale or Miami, and I semi-frequently encounter  
14 parking lots at major events or dense downtowns where I can't park. For instance, I'm not  
15 able to pay for parking in the cash-only lot at Le Tub in Hollywood, FL, which lacks good  
16 substitute parking alternatives nearby, and even after spending a long time explaining my  
17 religious beliefs the parking lot attendants refuse to accept anything other than cash for  
18 parking. Parking is hard enough to begin with; adding this in just makes it harder.

19 The worst experience I had with this was on a trip to Puerto Rico, where it wasn't even  
20 clear that I'd be able to get my car out of the lot after my ex-wife and I came back from a  
21 day of exploring and sightseeing. The parking lot's cash-only payment policies had not  
22 been made clear to us upfront.  
23

24 While generally this is an "inconvenience" rather than a substantial burden, when I'm  
25 caught by surprise RE: payment method restrictions on parking debt settlement to legal  
26 tender like I was in Puerto Rico paying for my parking becomes a serious threat that could  
27  
28

1 even, in a state of failure or failed compromise, deprive me of freedom or lead to towing  
2 and impoundment of my car.

3  
4 **m. Inability to Take Small Cash Donations in Small-dollar-committed Political**  
5 **Campaign:**

6 The Plaintiff is a candidate for the office of United States Precedent (commonly referred to  
7 as President) in the 2028 election. His campaign is built on an idealistic small-dollar  
8 strategy, intentionally structured so that even teenagers—whom he seeks to  
9 enfranchise—can participate as “max donors.” The only contemplated exception is a  
10 potential separate fundraising initiative to support a national incentive pool for living kidney  
11 and liver donations, justified under a “Lifesavers Override” imperative to protect and  
12 preserve life.

13  
14 This small-dollar (or “small CALM”) strategy, paired with federal matching funds, would  
15 function far more effectively if the Plaintiff were able to accept spontaneous campaign  
16 contributions of any kind, including cash, particularly in high-traffic urban areas. Such  
17 funds could be directly deposited into his campaign committee's account to support  
18 outreach, including distributing Lifesavers candies and miracle berries with  
19 suddenly-sweet-tasting sour fruits, pushing the envelope of the Overton windows and  
20 financing voter-by-voter the development of a lifesaving policy platform and campaign  
21 team. However, due to his strict religious objection to handling U.S. currency bearing the  
22 unhyphenated Name of G-d, the Plaintiff cannot accept or handle cash donations and can  
23 not allow or accept anyone organizing on his behalf or on behalf of any campaign team  
24 he's a major player in (for instance, if an equal-third member on the proposed *Lifesavers*  
25 *Trinity* triumvirate Precedential committee) to do so either. He is limited to slower, more  
26 cumbersome digital payment methods, which reduce spontaneity and accessibility for a  
27 large swath of prospective donors and voters.  
28

1 This religiously motivated restriction places Plaintiff Clayman's campaign at a uniquely  
2 severe disadvantage compared to other candidates. While every other campaign may  
3 accept and instantly use the full value of cash contributions—without alienating donors,  
4 without delay, and without incurring transaction fees—the Plaintiff's campaign cannot.  
5 Instead, every contribution must pass through credit-card processors or other  
6 intermediaries, effectively imposing a transaction-fee "tax" on his political activity that no  
7 cash-accepting campaign bears. Other candidates freely leverage small-dollar and  
8 spontaneous cash exchanges, whether through donations or low-cost campaign  
9 merchandise—buttons, t-shirts, or symbolic items such as Reagan's "Make America Great  
10 Again" (later adopted by Trump) or Andrew Yang's "Make America Think Harder" hats—to  
11 build grassroots momentum. Plaintiff, by contrast, is barred from this vital channel of  
12 political participation.  
13

14 If the Court doubts that this constitutes a substantial burden, or finds the US Attorney's  
15 claims that I face no substantial burdens credible, Plaintiff respectfully invites the Court to  
16 consider a simple test: impose, even temporarily, a prohibition on all political candidates in  
17 this District—or nationwide—from accepting or using physical cash for a single quarter in  
18 the midst of campaign season, and freeze their cash assets until a future currency reform  
19 reaches near-total penetration. Such an experiment would expose the inadequacy of  
20 cashless alternatives within days. It would also provoke immediate litigation from major  
21 Democratic and Republican candidates, almost certainly including Fifth Amendment  
22 "Takings Clause" challenges to their seized petty cash funds—the very argument Plaintiff  
23 presses here, arising from his own prior wedding gifts in U.S. currency that he cannot use  
24 because of the religious compulsion embedded in the national motto.  
25

26  
27 If this Court would hesitate or refuse to impose such a restriction on other presidential  
28 candidates in 2026 or 2028 to "level the field," then it must recognize that Plaintiff's

1 inability to use cash is not theoretical but a real, ongoing, and constitutionally significant  
2 burden on his rights to political participation and religious freedom. While one appellate  
3 court in *New Doe Child No. 1 v. United States* declined to credit this precise rationale,  
4 Plaintiff submits that his present circumstances are distinguishable: this is a different  
5 circuit, a different election cycle, with an actual and active candidacy at stake rather than a  
6 theoretical one. Estoppel cannot foreclose this claim, which is ripe for full consideration on  
7 the merits.  
8

#### 9 **n. Disrupted Investment Freedom**

10  
11 The Plaintiff does not feel religiously free to invest in banks that help destroy sacred cash  
12 per current law and Federal Reserve policy. As such, the Plaintiff can not invest in  
13 concentrated bank stocks or other cash-destroying businesses, and is forced to invest in  
14 narrow sector index funds rather than safer, more diversified broad index funds like the  
15 S&P 500, which currently holds at least 9 traditional or diversified banks (Bank of America,  
16 Citigroup, etc.) which I should not hold stock in, directly or indirectly, until they succeed in  
17 protecting G-d's Name on currency. To be transparent, I once recently traded into the S&P  
18 500 in an effort to match my investments to the general US economy, around the time that  
19 I realized I might have to run as a placeholder for the Precedency or Precedential Trinity  
20 Team. But I traded out of that position and am back in a more risky tech industry fund that  
21 doesn't contain any depository institutions. The only real financial institutions it contains  
22 are Mastercard and Visa, which advance cashless society standards.  
23

#### 24 **o. Psychological Derailment of Cash-primed Frugality**

25  
26 Major credit card companies, economists, and behavioral researchers have documented  
27 for decades that reliance on credit cards gradually erodes vigilance over spending. By  
28 contrast, the physical act of handing over a dwindling number of banknotes or coins

1 naturally prompts individuals to second-guess their choices and moderate their pace of  
2 spending. Entire budgeting systems, such as the “cash-envelope” method, are built on this  
3 dynamic to help households remain within strict financial limits. Yet I am categorically  
4 unable to draw on these tools—even partially—to re-anchor myself in disciplined,  
5 cash-based frugality.  
6

7 Over the years, I have observed in myself an unwanted drift toward less frugal habits, a  
8 drift that I cannot easily restrain without the tangible cues of cash—touching it, parting with  
9 it, and feeling its absence in everyday transactions. This is not speculative or anecdotal:  
10 the frugality-enhancing effect of cash is among the most well-established, robust, and  
11 reproducible findings in economic psychology, grounded in measurable neural  
12 mechanisms<sup>8</sup>. Denied access to cash, I am forced into a higher-effort, higher-willpower  
13 struggle simply to impose on myself the same restraint that cash naturally and predictably  
14 instills.  
15

16 I should not be placed at this systemic disadvantage—subject to the “step-on-the-gas”  
17 psychology of credit card spending—yet the Government, by refusing to accommodate my  
18 religious belief, has done precisely that. For more than eleven years, it has substantially  
19 burdened me with a steady stream of “death by a thousand papercuts” economic injuries  
20 in heightened debit or credit card-reliant spending, undermining my ability to live in  
21 accordance with my faith and maintain the frugality that holding and experiencing the  
22 more tangible loss-aversive pain of paying and losing cash uniquely supports.  
23  
24  
25  
26  
27

<sup>8</sup> MIT Sloan Study Shows Credit Cards Act to Step On Gas To Increase Spending".  
https://mitsloan.mit.edu/press/mit-sloan-study-shows-credit-cards-act-to-step-gas-to-increase-spending?utm\_source=chatgpt.com

1        **p. Punishing, Prohibitive Barriers to Retail Entrepreneurship and Investment of any**  
2        **kind due to Miami-Dade, Philadelphia, New York City, and other jurisdictions**  
3        **nationwide with cashless retail prohibitions**  
4

5        The Plaintiff resides in Florida near Miami-Dade County and previously lived there in  
6        Aventura for nearly two years. Miami-Dade provides a striking local example of the  
7        burdens imposed by cash mandates: the County's **Cashless Retail Prohibition**  
8        **Ordinance (Sec. 21-60)** requires every retail business to accept "United States coins and  
9        currency, including Federal Reserve notes," and imposes escalating penalties for  
10       noncompliance. Under **Miami-Dade Ordinance Sec. 8CC-4**, violations may incur fines of  
11       \$1,000 per day, doubling to \$2,000 per day for continued refusal to accept cash. For the  
12       Plaintiff, whose faith forbids the use of sacred cash except to donate it entirely to  
13       lifesaving charities, compliance would be religiously impossible. Yet no business can  
14       function if every cash payment received must immediately be given away, as though it  
15       were itself a charity.  
16

17       The question thus arises: *Can the Plaintiff, like nearly any other American, open a retail*  
18       *business in the coming decade while adhering to his religious convictions?* The answer is  
19       no. He would be coerced into accepting cash under threat of \$2,000 daily fines, forcing  
20       closure. When the Plaintiff contacted the Miami-Dade Office of Consumer Mediation to  
21       request an accommodation under Florida RFRA, his request was denied, and a follow-up  
22       email has gone unanswered.  
23

24       Without judicial recognition of religious exceptions to cash-acceptance mandates, the  
25       Plaintiff faces not only personal exclusion but also the chilling effect such ordinances  
26       impose on other observant Jews. Rabbis and Jewish business owners in Miami-Dade,  
27       New York City, Philadelphia, and other jurisdictions may be forced into a difficult  
28       reckoning: either suspend or restrict their cash operations until an exemption is granted,

1 or risk ruinous fines of \$2,000 per day. If Jewish law were to formally extend the  
2 longstanding practice of hyphenating or abbreviating G-d's Name to prohibit handling cash  
3 as sacred text (Shaimos), the impact on Jewish retail businesses could be devastating,  
4 very, very far beyond a "mere inconvenience".  
5

6 The Plaintiff recognizes the complexity of this mutual accommodation problem.  
7 Approximately 2–3% of U.S. households are unbanked and rely on cash exclusively. He is  
8 compassionate toward the burdens they would face if cash were refused. This tension  
9 helps explain why few rabbis have yet publicly endorsed his position: until U.S. currency is  
10 redesigned to remain civic but not sanctified, adopting his practice wholesale could create  
11 serious hardship for the unbanked while also dividing Jewish communities. Yet, this  
12 Plaintiff stands here as the starting point of that change—asking the Court to recognize  
13 that Jews with his beliefs cannot lawfully be forced into cash-based business operations,  
14 and that RFRA requires exemptions to protect both their faith and their livelihoods from  
15 the substantial burdens imposed by ordinances like Miami-Dade's.  
16

17 **p. Vulnerability to strict debt collection and payment practices and policies without**  
18 **access to legal tender**  
19

20 While many businesses tend to be accommodating, especially when I explain my religious  
21 beliefs, there's nothing stopping any business like a towing and vehicle impoundment  
22 company from insisting on debt settlement in cash-strict legal tender. While I try my best  
23 not to ever improperly park, almost every driver has made a mistake and gotten ticketed  
24 or towed at some point in their lives, even multiple times over stretches of 11 years, and I  
25 find that it is especially hard negotiating means of payment with organizations that carry  
26 coercive and controlling legal power over me or my possessions, particularly when legally  
27 I carry a debt that needs to be discharged that defaults into legal tender settlement. It's not  
28 comfortable being constantly under threat of being unable to discharge sudden debts just

1 because I carry no legal power to force debt settlement through any payment method I  
2 can actually use, while the debt collector has clear legal sanction to insist on legal tender.  
3 Flipped around as a CEO and entrepreneur, it isn't comfortable knowing that if my  
4 business ever indebts another business or goes into debt to another business without a  
5 protective CashAlt "method of payment" contract term in place, they might pay me legal  
6 tender and I would be forced under civil or criminal penalty legally to accept, or they might  
7 demand that I pay them in legal tender and I and my business would be forced into a  
8 deeply uncomfortable stand-off again under civil or criminal penalty.  
9

10 Not being able to use or rely on the use of legal tender is hazardous as an individual and  
11 as a business owner.  
12

13 **37. Challenge to the Court, Court Staff, and Officers of the Court:** I am arguing and  
14 asserting in all these subpoints that the aggregated "**thousand papercuts injuries**" and more  
15 major injuries and limitations I suffer in daily commerce and life rise far beyond "a mere  
16 inconvenience". If this Court or its Officers don't believe Plaintiff is substantially burdened, he  
17 challenges Members to recruit ten (or more) friends and family to live completely cashlessly for  
18 three months—30 months of collective experience--keeping assiduous journals on the  
19 frustrations they experience daily, weekly, and monthly being totally unable to use cash. Record  
20 your frustrations honestly and conscientiously with privacy losses, disaster fears during South  
21 Florida hurricane season, cash-only establishments, having to leave your wallets and purses  
22 outside bathrooms whenever nature calls, and in your professional lives violating the law to  
23 refuse any legal tender payments, as I must do if I were in your position, from citizens for any  
24 services like certified copies or bail payment. You'll surely become convinced of my burden  
25 within a day, or a month or two, if you are not already convinced now that the boundaries I'm  
26 constrained by transactionally in not being able to use cash or legal tender significantly limit my  
27 freedom and possibilities that I'm entitled to by American birthright.  
28

## **G. There is Often No Adequate or Legal Substitute for Legal Tender / Literal Cash**

38. In the case *New Doe Child No. 1 v. Congress of the U.S.*, 891 F.3d 578, 591 (6th Cir. 2018), the Sixth Circuit Court of Appeals introduced the supposition in its rejection of Plaintiff's inadequately listed and unenumerated substantial burdens that the Plaintiff could just as easily switch to paying for goods, services, and debts with credit card, debit card, or check. Specifically, they said, "Plaintiffs could avoid cash by using credit cards and checks" (*Id* 4). However, the Court erred in not recognizing that credit cards and checks are certainly not legal tender, and have significantly different properties than cash that lead many persons and institutions to strongly prefer or even insist on cash or legal tender instead.

39. In many of the substantial burdens listed above, it should be clear that the Plaintiff can not switch or can not switch effectively to credit card, debit card, check, or other means. The properties of cash versus credit card versus check are many, but the critical point is that physical cash especially in the absence of a universal Central Bank Digital Currency (CBDC) or other alternative legal tender still has a special and unique place as the sole legal tender and plays a distinct role for debt settlement, privacy, efficiency, universality, simplicity, immediate settlement, speed of hand-to-hand exchange, low transactional costs, trustworthiness, psychology, ease-of-use, standard acceptance as a best-alternative-to-negotiated-alternative (BANTA), emergency and disaster preparedness, coordination and cooperation with those households that are entirely cash-reliant and unbanked, effectiveness in a power outage or battery failure, "tuckable" convenience when running outdoors, and more. If you think that cash is completely replaceable without substantial burdens, you haven't thought hard enough about how Americans live their whole lives, through all the ups, downs, lefts, rights, and sideways experiences we have over the course of a month, year, or lifetime. The Plaintiff would very much like to get back to

1 using cash as soon as possible; Governmental policy currently forbids that with no light yet at the  
 2 end of the tunnel.

### 3 4 **H. Ceremonial Deism Rejected**

5  
6 40. There has been a "legal" or "extra-legal" idea of ceremonial deism suggesting  
 7 governmental religious expressions like "In G-d We Trust" are harmless due to long-standing  
 8 dilute and diluting usage. **Plaintiff rejects this excuse** on grounds that ceremonial deism is  
 9 inconsistent with Talmudic Tractate Rosh Hashanah 18B4, where even "superfluous" printings of  
 10 G-d's Name were deemed inappropriate as they would end up on a "dunghill," and general  
 11 Jewish doctrine in which diluting the Name of G-d through superfluous overuse to meaningless  
 12 or irrelevance is not considered acceptable or permissible.

13 41. In *Lynch v. Donnelly* (1984), Justice Brennan wrote that these phrases were protected  
 14 from scrutiny because they "have lost through rote repetition any significant religious content."  
 15 Plaintiff fiercely disagrees—the Government cannot or at least should not dilute any of G-d's  
 16 Sacred Names in any language to meaninglessness through overused secular repetition.

17 42. Plaintiff cannot reasonably expect the Government to bury currency fully intact at  
 18 end-of-life, and machine-stamping out the Name or the National Motto mechanistically from all  
 19 currency subject to destruction is an impractical mechanical engineering step. The only feasible,  
 20 reasonable strategy is immediate Court-ordered currency redesign.

## 21 22 **I. Exhaustive Detail on Pretrial Detainment for Lack of Legal Tender In** 23 **Violation of Legal Presumed Innocence**

### 24 25 **1. Plaintiff's Prior Detention and Denial of Access to Cash Alternatives**

26  
27 The Plaintiff was detained for 28 days in Illinois before cashless bail reforms, despite having  
 28 more than \$80,000 in liquid funds available through check, debit card, or electronic transfer. Jail

officials categorically denied access to those methods, requiring instead the use of physical cash the Plaintiff could not religiously handle.

## **2. Arbitrary and Inconsistent Bail Payment Rules**

Broward County allows credit card payments, while Palm Beach and Miami-Dade require physical cash only. This patchwork leads to arbitrary detention based not on risk or means, but on geography and a jail's narrow policy.

## **3. Practical Consequences**

Reliance on bail bondsmen is illusory for many detainees, as access to phones or negotiations is blocked. Even when possible, the 10% nonrefundable fee can exceed the coercive fines recognized as substantial burdens in Yoder (\$5) and Hobby Lobby (\$2,000).

## **4. Widespread Problem of Cash-Only Bail**

Federal Reserve data shows that two in ten Americans carry no cash on a typical day, and the average carries only \$67. Thus, any bail above that threshold disproportionately detains the cashless. For the Plaintiff, this is further compounded by religious restriction, placing him in "artificial absolute poverty" in cash-strict systems.

## **5. Technological and Institutional Alternatives (CashAlt)**

The Plaintiff argues that check, ACH, FedNow, or monitored digital transactions could resolve these problems. The Government's refusal to adopt such accommodations violates due process and equal protection, and traps the presumptively innocent in pretrial servitude.

## **6. Judicial and Governmental Responsibility**

Judges and jailers reflexively deny electronic payment access, often by rote citation of policy rather than constitutional analysis. This reflex converts a person's lawful condition—cashless but otherwise solvent—into unlawful imprisonment, in violation of Robinson.

## **7. Plaintiff's Means and the Cash-Strict Catch-22**

The Plaintiff routinely carries around \$83,000 in accessible electronic funds via his credit cards, debit cards, and checkbook, which are linked on and payable from his smartphone and smartwatch as well, but Plaintiff is treated by jail staff in thousands of counties across the United States as "unable to pay" bail and functionally impoverished by cash-only cash-strict systems. This makes religiously prohibited tender the only path to liberty—an unacceptable RFRA burden and a "condition or status" violation per *Robinson v California*.

## **8. Broader Equal Protection Failures**

The Plaintiff urges nationwide CashAlt standards, guaranteeing timely release (within two hours for most cases) based on any lawful payment method, at least all those accepted by Courts and the Internal Revenue Service for the payment of court fees from members of the public and taxes at credit card and debit card processing surcharges no higher than what the Government charges taxpayers outside detention paying their taxes. Without this, liberty is conditioned on arbitrary payment forms and familial support, fracturing equal protection of law, and if CashAlt is accepted but at supremely high fees like 7% processing fee premiums, detained payers are subjected to unconscionably high discriminatory fees presumptively tipping the scales marginally from "limit of acceptable adjudicated bail" to "excessive bail by an added 5%", in violation of the Constitution's 8th Amendment when readily available alternatives exist like the IRS payment

1 acceptance standard set currently via Pay1040<sup>9</sup> to:

2  
3 Debit Card: Flat \$2.15 fee

4 Personal Credit Card: 1.75% processing fee with a minimum \$2.50 charge

5 Commercial Credit Card: 2.89% processing fee with a minimum \$2.50 charge

6 Cash: \$1.50 fee

7 Cards Accepted: Visa, Mastercard, Discover, American Express, STAR, Pulse,  
8 NYCE, Accel, AFFN, Cirrus, Interlink, Jeanie, Shazam, Maestro

9 Digital Wallets Accepted: Click to Pay; PayPal  
10

11 The Plaintiff does not argue with a 2% or 3% processing fee for credit cards. Above a  
12 3% processing fee, Plaintiff would object strenuously and even appeal on grounds of  
13 unnecessarily excessive bail applied discriminately to credit card users.  
14

15 **9. System Seems Designed to Protect the Bail Bondsmen Industry, not the**  
16 **Freedom of Detainees in Pretrial Detention**  
17

18 The persistence of cash-only bail requirements appears not to serve any genuine  
19 public-safety interest, but instead to channel business toward the bail bondsman  
20 industry. When a detainee has the personal means to pay bail directly through check,  
21 debit, or electronic transfer as I do but is prohibited from doing so, the only remaining  
22 path to freedom is to contract with a private bondsman. These intermediaries extract a  
23 standard 10% nonrefundable premium fee, which can amount to thousands of dollars  
24 even in routine cases. In effect, the State delegates to private actors a gatekeeping role  
25 over liberty, compelling defendants to enrich a commercial industry before exercising a  
26  
27  
28

<sup>9</sup> <https://www.irs.gov/payments/pay-your-taxes-by-debit-or-credit-card>

1 constitutional right to pretrial release. Such compelled economic loss is not imposed on  
 2 wealthier individuals without this Talmudic religious belief whose families deliver cash to  
 3 the jailhouse, nor on those capriciously and arbitrarily lucky enough to be arrested in  
 4 jurisdictions that accept personal cards or electronic payment from the detainee directly.

5  
 6 By structuring the system this way, government policy creates a two-tiered scheme:  
 7 defendants who lack my religious beliefs with family members carrying large sums of  
 8 legal tender avoid paying anything beyond the bail itself, while detainees without such  
 9 support or bound to religious beliefs like mine may be forced into bondsman contracts<sup>10</sup>  
 10 that permanently deprives them of a significant portion of their wealth. The disparity is  
 11 not incidental; it functions as a built-in subsidy to the bail bondsman industry, sustained  
 12 by regulatory inertia and by lobbying pressure to keep "cash" defined narrowly. The  
 13 Constitution does not allow the State to outsource liberty to private profiteers at the  
 14 expense of religious minorities and the cashless majority. Yet the practical effect of the  
 15 cash-strict model is exactly that: it protects the economic interests of bail bondsmen by  
 16 foreclosing less costly, equally secure CashAlt alternatives.

## 17 **J. Historical Context**

18  
 19  
 20  
 21  
 22  
 23  


---

 24 <sup>10</sup> In my case, I can only coordinate and hire the (unwanted) help of bail bondsman if  
 25 they agree to operate entirely cashlessly, if I can trust them to do so, and if they  
 26 agree to accept me on my oral pledge that I'll pay them back for the bond and premium  
 27 once I have my freedom restored. Bondsmen typically don't accept oral pledges of  
 28 repayment though; they typically insist on family outside settling the bail cost and  
 29 premium immediately, and as I've said I can't rely on family or friends for that  
 30 function if and when arrested. Jails do not facilitate contract negotiation or  
 31 immediate credit card payment from jail of bail bondsmen and though I've tried  
 32 repeatedly I've been unsuccessful trying to work out an advance contract in Palm  
 33 Beach County, much less the entire country, for the coverage of any bail by cashless  
 34 funds advance I might be hit with at any point in the rest of my life in the United  
 35 States. Long story short: I can't rely on family, friends, or bondsmen.

1  
2 34. The Federal Reserve's routine shredding of worn currency containing G-d's name  
3 conflicts with Plaintiff's beliefs and those dating to the Hasmonean Maccabees.

4 35. The practice of using the motto "In G-d We Trust" dates to and originates with the  
5 Confederacy's slaveholding traitor-rebels, who made "*De- Vindice*" their motto for the Seal of the  
6 Confederate States first before the Union mimicked in a religious panic, copying a variant of that  
7 under the notably evangelical and highly controversial Secretary Salmon P. Chase on the 1864  
8 two-cent coin in the form of "In G-d We Trust". Chase became Chief Justice shortly thereafter,  
9 almost certainly extinguishing and "killing in the cradle" all proper legal challenges under the 1st  
10 Amendment "Separation of Church and State" before they could be mounted when this deistic  
11 tradition was in its cradle, before it attained the patina of "accepted tradition", and before any law  
12 like RFRA existed giving individuals the right to challenge any substantial burdens they faced  
13 under the new sacred religious motto.

14 36. Even at the time, the "In G-d We Trust" motto was highly controversial. A very significant  
15 faction of Christians of several denominations and Jews are documented in opposition to the  
16 introduction of this motto in contemporary newspapers. It only became more accepted over a  
17 hundred years of "breaking us in" as a people to it, through a slow process of acceptance of and  
18 learned helplessness at its imposition by the federal government and Congress.

19 37. You can see this strife over the motto respark in 1907. In 1907, President Theodore  
20 Roosevelt attempted to strike the *In G-d We Trust* motto from one of the coins on which it had  
21 been customarily placed, arguing it was religiously irreverent and improper because the impulse  
22 toward currency acquisition was associated with *Mammon* rather than *G-d*. There was a very  
23 fierce debate with many supporting the "no sacred motto" Roosevelt (Roseaveit) side of the  
24 debate. If RFRA had existed, Plaintiff believes the motto would have been permanently stricken  
25 in and by 1908, if by no other party than by Theodore Roosevelt bringing a RFRA lawsuit bravely  
26 himself. However, RFRA did not exist at the time, and by that time a majority of Congress  
27 compromised in the tempest in the direction of requiring the *IGWT* motto to be restamped on  
28

1 gold coins, and so Rosevelt retreated, retrenching his political and social capital for other  
2 battles.

3 38. Since 1955, 31 U.S.C. §§ 5112(d)(1) and 5114(b) mandate "In G-d We Trust" on all  
4 currency.

5 39. Today RFRA exists, and finally individual religious Plaintiffs have the power to overturn  
6 neutral Government laws that substantially burden their religious expression, like the laws  
7 requiring minting and printing the "In G-d We Trust" motto on currency do.

8 40. It is profoundly awkward that, during my time in China from 2014 to 2015, I found it  
9 religiously possible—and indeed easier—to use Chinese currency featuring the portrait of Mao  
10 Zedong, a figure I regard as a mass murderer (see *Great Leap Forward*, the largest or  
11 second-largest famine in history and completely Mao-made, or the *Cultural Revolution*), yet I  
12 cannot use post-1955 United States currency, the money of my own homeland, at all. In China, I  
13 would sometimes pin back the notes with clips or hairpins so that only the images of natural  
14 scenery or accomplishments by the Chinese People like the Three Gorges Dam were visible  
15 when handing over cash, attempting to obscure Mao's likeness, whose crimes I could not  
16 condone by passing him forward as a national hero or idol. On occasion, at real personal risk, I  
17 even wrote the characters for "mass murderer" (大屠杀者, *perpetrator of a massacre*) on the  
18 banknotes I carried, as a small act of protest. Still, the essential fact remained: I could at least  
19 use the notes for their intended purpose as circutable currency, while politely signaling  
20 disapproval of Mao's glorification.

21 41. By contrast, I cannot circulate American currency at all. Like Mao's image, the American  
22 tradition of placing deceased presidents on currency reflects a kind of idolatrous political  
23 vanity—akin to President Trump's well-publicized wish to be added hagiographically to Mount  
24 Rushmore as a political saint and the introduction of H.R. 1761, the "Donald J. Trump \$250 Bill  
25 Act," both of which Plaintiff considers idolatrous or borderline idolatrous. But what makes U.S.  
26 banknotes religiously impossible for me to handle is not merely the imagery; it is the  
27  
28

1 unhyphenated, sacred Name of G-d emblazoned on every note. That single feature makes  
2 American cash insurmountable for me to use, and it is the specific core burden from which I  
3 respectfully plead for relief.  
4

## 5 **K. Lessons from Israel**

6

7 37. Israel is explicitly a Jewish nation-state that controls its own currency. Despite being a  
8 Jewish religious state, Israel has repeatedly rejected attempts by ultra-Orthodox parties to print  
9 even oblique references to G-d on currency. The case of Israel illustrates that less restrictive  
10 alternatives exist to communicate anything that the Government has a compelling and legitimate  
11 interest to communicate from a ceremonial deist perspective in an *ephemeral, unprinted* medium  
12 that doesn't get desecrated at time of destruction or carried into bathrooms where the Name of  
13 G-d should not be taken.

14 38. Even printing "Be'ezrat Hashem" ("With the help of The Name")—similar to changing "In  
15 G-d We Trust" to "In The Name We Trust"—has been rejected by the Israeli government,  
16 including by Stanley Fischer when he served as Governor of the Bank of Israel before becoming  
17 Vice Chair of the US Federal Reserve.

18 39. If "In The Name We Trust" wasn't kosher and secular enough for the Bank of Israel, then  
19 "In G-d We Trust" is even more serious an unkosher violation of acceptable Jewish customs  
20

21 40. The United States, which isn't a sectarian country, should not go further in evangelization  
22 than Israel itself is willing to go, particularly given the substantial burdens this causes Jewish  
23 Americans.

24 41. Until and unless Israel agrees to print anything similar to "In G-d We Trust" on its  
25 currency (as some super-ultra-Orthodox schisms/factions wish and repeatedly propose in  
26 allusive indirect form, only to be repeatedly smacked down), the United States implicitly lacks  
27 permission or cause from the Jewish people and faith as a whole to do the same.  
28

## **L. Jewish Involvement in U.S. Currency Management**

40. Since 1986 (the year Plaintiff was born), individuals of Jewish heritage have frequently held key positions overseeing currency, having their signatures printed on US currency to "sign off" on the design, meaning, and value of the currency:

- Robert Rubin (Treasury Secretary, 1995-1999)
- Lawrence Summers (Treasury Secretary, 1999-2001)
- Ben Bernanke (Fed Chair, 2006-2014)
- Janet Yellen (Fed Chair, 2014-2018; Treasury Secretary, 2021 - Inauguration 2025)

41. Former Secretary Yellen, openly a practicing Jew, has her signature on much of the currency printed with G-d's unhyphenated name. Same with Former Secretary Lew, openly a practicing Orthodox Jew.

42. Statistically, almost all the currency signed by these Jewish Fed Chairs and Treasury Secretaries has passed at least one typical destruction half-life, with only the most recent rounds of Yellen currency still probabilistically undestroyed and circulating through bathrooms.

43. The Plaintiff has heard some rabbis argue that even though printing the unhyphenated Name of G-d on currency should be avoided, it's maybe ok as long as non-Jews are doing the printing, minting, signing, and destruction of it.

44. As a people, Jews cannot wash our hands of the obligation to protect this currency by claiming we live in a "non-Jewish" "Christian" country with "non-Jewish" currency. Those arguments are un-American. Our currency and country is pluralistic and must be embraced by and be compatible with all faiths, including Judaism, under a mutually religiously tolerant reading of Tractate *Rosh Hashanah*.

45. The currency design must be consistent with no religious discrimination or religious burden in federal employment in any position in the Treasury Department, and should not reflect the early Hasmonean attitude that superfluous printing and circulation of the Name of Heaven on

secular documents that get unceremoniously destroyed and carried through bathrooms daily is ok. As a thought experiment, if in a flash all employees of the federal government were Muslim, or Jewish, or Christian, or Buddhist, or Hindu, or Atheist, there should be no need to change anything about the government just because the government were Muslim, Jewish, Christian, or Atheist on that day in history. The currency and National Motto is not currently consistent with that thought-experiment. Even the orthography on the Name of G-d would be highly unstable under this "Religious Blink Test".

- The Name of G-d would be immediately changed to "All-h" if the Government were Muslim.
- The Name of G-d would be immediately abbreviated or hyphenated if the Government were Jewish, or removed entirely as impermissible proselytism and ceremonial deism diluting the value and sacredness of G-d's Name, settling somewhere near Israeli policy on this.
- The motto might be changed instantly to "In Gods We Trust" if the Government were Hindu.
- The Name of G-d would instantly be removed or the motto changed to "In Good We Trust" or another secular alternative if the Government were Nonreligious or Atheist.

**46. ARGUMENT:** The currency design (motto, title, and graphics) *must* pass this "religious blink test" to be truly acceptable and unchallengeable under RFRA and the 1st Amendment.

## V. LEGAL FRAMEWORK

### A. RFRA Standard

42. Under RFRA, a "substantial burden" exists when the government puts significant pressure on individuals to modify behavior or violate beliefs, or forces choice between faith and government benefits. *Burwell v. Hobby Lobby*, 573 U.S. 682 (2014); *Gonzales v. O Centro*, 546

U.S. 418 (2006). This is similar to the 1st Amendment standard, "where the state conditions receipt of an important benefit upon conduct proscribed by a religious faith, or where it denies such a benefit because of conduct mandated by religious belief, thereby putting substantial pressure on an adherent to modify his behavior and to violate his beliefs, a burden upon religion exists. While the compulsion may be indirect, the infringement upon free exercise is nonetheless substantial." *Thomas v. Review Bd., Ind. Empl. Sec. Div.*, 450 U.S. 707 (1981). This case involves just such substantial or significant pressure to modify behavior or violate beliefs, forcing a choice between faith and the Governmentally-guaranteed properties, facility, and function of cash legal tender in our society.

43. In *Burwell v. Hobby Lobby*, the Court held it is not the judiciary's role to question correctness of religious beliefs, only whether sincerely held and substantially burdened.

44. To determine whether a religious belief has been substantially burdened or coerced, the Court has consistently held that even modest penalties can suffice. In *Burwell v. Hobby Lobby*, the Supreme Court found that a \$2,000 per-employee penalty was beyond sufficient to constitute a substantial burden. In *Wisconsin v. Yoder*, 406 U.S. 205 (1972), a \$5 fine and the threatened maximum of three months' imprisonment were deemed sufficiently coercive under the First Amendment to merit Supreme Court intervention. Likewise, in *Gonzales v. O Centro*, 546 U.S. 418 (2006), the Court found a substantial burden where no fines or charges were imposed, but 110 liters of sacramental ayahuasca tea were seized and destroyed by the government. By the same measure, the United States' current policy and practice—confiscating and eventually destroying given enough time almost 100 out of every 100 banknotes the Plaintiff attempts to deposit, along with countless tens of thousands of sacred notes and coins (surely surpassing 110,000 separate units of holy currency) that passed through his custody from childhood until his 2014 realization 11 years ago of their heightened sanctity—imposes a burden well beyond "mere

inconvenience.” This includes the government’s more recent destruction of wedding gift banknotes deposited then immediately transferred to lifesaving charities after Plaintiff’s marriage. Even without being in the chain-of-custody, the ongoing confiscation/destruction of sacred banknotes by the US Government unceremoniously directly burdens Plaintiff’s faith. Under any of the established precedents and tests above, the Plaintiff’s injuries and exclusions from commerce rise to and go beyond the standard minimal level of RFRA substantial burden. To argue or adjudicate otherwise would eviscerate RFRA.

45. Plaintiff sincerely believes handling currency bearing G-d’s unhyphenated name desecrates that Name. Because the government mandates such currency with no alternatives, Plaintiff must choose between freedom and economic participation vs religious observance—the definition of substantial burden under RFRA.

46. RFRA protects sincerely held beliefs whether or not widely shared. Courts cannot reject protection because a practice is rare (*Thomas v. Review Bd.*, 450 U.S. 707 (1981))

## **B. Constitutional Standards**

47. The First Amendment prohibits the government from burdening religious exercise or establishing religion. The Fifth Amendment prohibits taking or freezing property without compensation and guarantees due process. The Eight Amendment prohibits excessive bail and cruel and unusual punishment like additional days in jail predicated solely on Plaintiff’s lawful and sincere religious belief that American legal tender is too holy and too early-Hasmonean to circulate, per Talmudic Tractate *Rosh Hashanah* 18B.

## **VI. CLAIMS FOR RELIEF**

### **COUNT I – Violation of RFRA (42 U.S.C. §§ 2000bb et seq.)**

**(Against All Defendants)**

48. Plaintiff incorporates paragraphs 1-47.

49. The government imposes substantial burden on sincerely held beliefs by requiring interaction with and circulation of currency that desecrates G-d's Name, particularly as the sole form of currency granted legal tender status with the legally-guaranteed power to discharge debts and be accepted for Governmental services.

50. The government lacks compelling interest in using sacred form unhyphenated versions and fails to use least restrictive means.

51. Less restrictive alternatives include: hyphenated form ("In G-d We Trust"), secular alternatives ("In Good We Trust"), or complete redesign with new civic religious motto and currency name.

**COUNT II – Free Exercise Clause Violation**

**(Against Treasury Secretary Bessent, Federal Reserve Chair Powell, United States)**

52. Plaintiff incorporates paragraphs 1-51.

53. Government actions prevent Plaintiff from engaging in essential civic and economic life due to religious refusal to desecrate sacred names.

54. The law indirectly coerces behavior conflicting with religious observance.

55. The Government demands that the sacred Name of G-d be printed on a cotton-linen medium on banknotes, minted on US coins that are frequently soiled or hit the floor, printed on US Passports that are frequently walked into airport and other bathrooms, and printed on other security and paper secular documents superfluously that are similarly damaged, destroyed, or defiled regularly in such a way so as to guarantee that the Name of G-d will be frequently defiled or destroyed unceremonially by the Government's own hand.

1           56. The Plaintiff's religious beliefs prevent him from participating in a system that prints the  
2           Name of G-d on destructible print or other material media willy-nilly without Flag Code-level  
3           religious recollection and intact Name of G-d burial consistent with Jewish practices for *Shaimos*.  
4           The Government is establishing a mode of state-sponsored religion that non-incidentally insists  
5           on *printing* the sacred vernacular Name of G-d on non-digital media then shredding it a few  
6           years later, exposing cash carried with the Divine Name in purses and wallets and pockets to  
7           bathrooms several times a day, rather than desisting in reference to the Plaintiff's beliefs and  
8           others with similar beliefs who must protect and safeguard the name of G-d on and in all forms of  
9           print media, and must avoid using it superfluously in secular print documents, as per Talmudic  
10          Tractate Rosh Hashanah 18B.

12          57. Neutrality collapses when government action burdens or privileges a single religious  
13          practice while disregarding others. Here, Plaintiff is effectively excluded from both bail and  
14          commerce—a targeted exclusion in effect if not expressly in name. The Government's present  
15          insistence that I suffer no burden and am entitled to no relief, if carried forward by Congress and  
16          the Executive Branch without judicial correction, risks permanently preventing me from taking the  
17          Oath of Office as an anchoring President within a Team Presidency. The concern is not  
18          theoretical: such exclusion could spark a prolonged economic crisis and institutional standoff  
19          between Congress, the Executive, and the Courts. As President Truman reminded the nation  
20          with the sign on his desk, "the buck stops here"; absent judicial intervention, that desk may be  
21          rendered permanently inaccessible.

22          58. The need for adjudication is therefore urgent, and ideally should be resolved before the  
23          nation's 250th Anniversary of Independence—well in advance of the next Precedential and  
24          Presidential Election. I trust that Secretary Bessent, Chairman Powell, and President Trump are  
25          capable of committing to, managing, and facilitating this transition smoothly and responsibly, and  
26          I hope they will do so freely and voluntarily rather than only because of the compulsion of Court  
27          orders. Discovery may shed light on their individual positions, which may not be as oppositional  
28

as and may be much more collaborative than the U.S. Attorney's litigation posture suggests.

What matters is ensuring that someone with religious beliefs like mine can see a genuine path forward, one that avoids an entrenched power conflict and instead allows us to remain confident and audaciously hopeful about the pluralistic future.

59. This along with all my other referenced non-incidental substantial burdens puts Plaintiff's free exercise both as an ordinary citizen, as an American Jew with these beliefs, as a religious CEO and founder, and as a flawed religious political candidate running reluctantly for eventual at-least-fractional assumption of the Precedency (Presidency) in jeopardy.

### **COUNT III – Establishment Clause Violation**

#### **(Against Congress, United States)**

60. The mandated use of the phrase "In G-d We Trust" in this particular unhyphenated sacred spelling / orthography as the national motto constitutes an endorsement of a particular religious viewpoint about how that sacred name can be used and improperly positions the Government as a religious authority in such a way so as to contradict Talmudic Tractate Rosh Hashanah 18B. This violates the Establishment Clause of the First Amendment and does so in a particularly egregious manner with respect to Jewish religious traditions and obligations, which strongly oppose the casual or superfluous use of G-d's sacred Name in secular contexts.

61. Basically, the US Government is taking the same position as the Hasmonean Kingdom initially did in ancient times after the defeat of the Greeks, writing / printing the Name of G-d willy-nilly on secular financial instruments and documents without taking great pains to protect the Name of G-d throughout the document lifespan cradle to grave. The US Government can not take the Hasmonean Position without picking sides in a Jewish historical religious debate that was, I argue, adjudicated by the Sages clearly in favor of my position at least for anyone who religiously hyphenates the vernacular Name of G-d.

62. The laws surrounding the printing and minting of the national currency and national motto in combination with its exclusive status as legal tender for purposes of paying such things as the discharge of debts and typically assigned cash bail in a typical arrest experience qualify this law as impermissibly coercive, and the historical practices of printing other mottos on our currency up until 1955 and all the religious upheaval and dissent in our history around the use of this National Motto show that these enabling laws should not continue to be held forward as constitutional.

63. Furthermore, the doctrine of "ceremonial deism" is not so kosher in my understanding of Judaism, particularly in secular print media. In Judaism, the potency of G-d's printed Name and the potency of religious practices must be maintained and defended from overprinting, superfluity, or spiritual emptiness. The Name of G-d is analogically like the holiest type of trademark that has to be protected from Governmentally-driven **genericide**. This Government insists on driving the sacred Name of G-d toward genericide, claiming that generic usage is permissibly non-Establishing, and I argue that it's Establishing, and even in the alternative if it's not Establishing it's by your own admission "genericidal" of the sacredness and sectarian potency of the Holy Name.

64. Moreover, the mandated motto fails the older three-pronged **Lemon Test** established in *Lemon v. Kurtzman*, 403 U.S. 602 (1971). Specifically, it lacks a **primarily secular purpose**, as evidenced by the Plaintiff's presentation of multiple available alternatives—such as renaming the national currency to "**Trust**," "**CALM**," "**Deeds**," or "**Seeds**" (or another contest entrant)—which would promote shared civic virtues (e.g., trust, tranquility, altruism, or intergenerational long-term investment) through religiously neutral means. These alternative titles would serve the same or even greater public messaging goals at a much louder volume in the major motto (as the replacement for the dated "dollar" currency title) while avoiding sectarian entanglement, thus constituting less restrictive means to achieve similar objectives.

65. The continued use of "In G-d We Trust" not only alienates religious minorities, including Jews, agnostics, atheists, and polytheists, but also imposes a constant symbolic and theological burden. For Jewish adherents like me in particular who hyphenate and protect the vernacular Name of G-d, it creates a daily conflict of conscience or forces me to rewrite my life around my inability to circulate United States oversacred cash. The Government's insistence on this religiously hyper-charged motto, particularly in its prominent placement on currency—functionally a "minor motto" with major civic effect—has the consequence of entangling the State with early Hasmonean religious doctrine in violation of longstanding constitutional prohibitions and settling Talmudic tradition.

66. To remain consistent with its constitutional obligation of neutrality toward religion, the Government should transition to a **pluralistic civic motto and currency title**—one that reflects universal values and promotes inclusive participation across belief systems, and does not act in an impermissibly coercive manner against the Plaintiff's religious belief in Talmudic Tractate 18B and related Jewish Shaimos laws and customs in Hebrew and vernacular.

67. Such a shift, timed with the 250th anniversary of the nation's founding, would allow for a "large, loud, and proud" civic "major motto" chosen through democratic process to replace the sectarian default, guiding trillions of annual economic and social exchanges toward shared civic ideals, and if we choose a "major motto" (currency title) well, it will have the effect of priming and shading slightly different, marginally better, more considerate, thoughtful, and prudent economic decision-making every time a cost, price, or value for anything is given, encountered, spoken, or mentally considered.

#### **COUNT IV – Takings Clause Violation**

**(Against Federal Reserve Chair Powell, United States)**

68. Plaintiff incorporates paragraphs 1 through 67 by reference.

69. The Plaintiff has been effectively deprived of the practical full use of his property without just compensation and without 100% certain and protected noncriminal means of unfreezing such frozen cash-strapped assets and achieving value conversion through clipping or cutting out the Name of G-d and depositing the rest, in violation of the Takings Clause of the Fifth Amendment. As one illustrative example, the Plaintiff received \$1,485 in cash wedding gifts—irrevocable transfers from invited guests—which he could not politely decline or convert into alternate forms of value. Due to his religious objection to using currency bearing the unhyphenated sacred Name of G-d, those funds were essentially frozen and rendered unusable for any purpose within his marriage.

Ultimately, the Plaintiff concluded that the only religiously permissible course of action was to donate the funds to a malaria prevention charity recommended highly by GiveWell.org that provides life-saving bed nets, in accordance with the Jewish doctrine of *pikuach nefesh* (the duty to preserve life), which he refers to as the “Lifesavers Override.” While Plaintiff takes moral satisfaction in having made that donation, the donation was not a free choice—it was a religiously compelled sacrifice necessitated by governmental policy. The Plaintiff should have been able to make meaningful, ordinary, **full use** of his wedding gifts, just like any other United States citizen, without government-imposed religious burdens functionally “taking” the full fungible value of his property.

70. Because Plaintiff is unable, for religious reasons, to use or circulate cash in the same way as others, with his full and free use of the cash he owned being severely restricted in a flash and all incoming cash gifts forcibly tied to lifesaving charitable purposes, the value of his cash holdings to Plaintiff is materially diminished. Government policy mandating the use of the unhyphenated religious motto on all currency results in a differential and burdensome impairment of Plaintiff’s property rights, effectively stripping his cash assets of their utility without offering any compensation or accommodation in return. The Plaintiff is seeking to remarry with all due haste, as the Plaintiff wishes to become a father and grandfather, and spend adequate

time during his lifetime with his future children and grandchildren. The Plaintiff does not want to have to again get burdened by cash wedding gifts he can't return or exchange, but that's the likely and inevitable future the Plaintiff faces unless this Court grants some form of relief, like permission to cut out and protect the subtextual National Motto and deposit the funds freely without being accused of and charged with a currency mutilation misdemeanor, punishable with expensive and distracting prosecution and if convicted punishable with up to 6 months in jail.

## **COUNT V – Right to Petition Government for Redress *and* Trust That They'll Actually Respond with Religious Protections**

### **(Against Congress)**

71. Plaintiff incorporates paragraphs 1-70.

72. Plaintiff petitioned Congress 10-11 years ago, took multiple trips to Washington, spoke with Senators Portman and Brown during "coffee hour meet and greets." Had they acted, the currency system would already be clear of sacred form currency, and we could have hosted a brilliant "Quarter-Millennial Crime-fighting Currency Naming Contest" as part of the July 4th celebrations that just passed, building excitement for the July 4, 2026 quarter-millennial. Now, any such "design and renaming contest" will need to be held this year, and as time passes the practical depth of such a national design contest or celebration thins. I freely recognize that I'm partly to blame for that, by not giving up on any other avenue and just bringing this case to Court for adjudication several years ago. But notably, several years ago LLMs weren't as advanced as they are today, in earlier years my ability to consult machine systems for legal advice and pointers without having found a lawyer specialized in RFRA ready to take this complex and extremely multifaceted RFRA case was much more limited.

## **COUNT VI – Reasonable Pro Se Fee Request**

**(Against All Defendants)**

73. Plaintiff incorporates paragraphs 1 through 70 by reference.

74. Under RFRA, “Reasonable Pro Se Fees” should be awarded by analogy to attorney’s fees, to motivate and compensate for faster, more effective filing by pro se litigants advancing complex religious liberty claims—claims that often require deep theological grounding and constitutional interpretation that many attorneys are unfit, unable, or unwilling to take on. Plaintiff made a concerted effort to retain legal representation for this matter but was unable to secure counsel willing to pursue a RFRA case under a contingency model or at an affordable hourly rate.

75. Plaintiff seeks \$18,000 in compensation for assembling and prosecuting this case to its present stage, representing 228.3 hours of labor at his last provable wage of \$78.84/hour as a Software Engineer II at InVenture Capital Corporation. In truth, this case has already required far more than 230 hours of intellectual, spiritual, and legal effort—and will require many more. Nonetheless, Plaintiff would not object to a strict fee cap of 200–230 hours.

76. While RFRA does not contain an explicit fee-shifting provision, this Court should recognize the deep kinship between RFRA claims and civil rights claims brought under 42 U.S.C. §1983. Under 42 U.S.C. §1988, courts routinely award attorney’s fees to prevailing parties in civil rights cases to incentivize enforcement of fundamental constitutional protections. The same logic applies with equal, if not greater, force to RFRA: it is a congressional “super-statute” designed to give religious liberty claims priority over facially neutral laws. Denying reasonable fee recovery to pro se plaintiffs under RFRA would undermine its core function, especially in cases like this one where access to legal representation is impracticable.

77. Additionally, the Equal Access to Justice Act (EAJA), 28 U.S.C. § 2412, recognizes that prevailing parties in lawsuits against the United States should not bear the full financial burden of enforcing their rights—particularly when the government's position lacks substantial justification. While EAJA typically covers represented parties in administrative or benefits-related cases, it underscores a longstanding congressional policy: when citizens prevail against the federal government in good faith, they should not be left worse off economically for having sought justice. The Plaintiff requests the Court to extend that principle equitably to this RFRA claim in light of its moral and constitutional gravity.

78. While pro se litigants are typically barred from recovering attorney's fees under §1988, Plaintiff respectfully asks the Court to recognize a narrow religious liberty exception—either under its equitable authority or through creative extension of RFRA's enforcement logic. Plaintiff does not claim the value of time as legal fees, but as compensable labor necessary to vindicate fundamental rights where no licensed advocate would tread.

79. In the alternative, Plaintiff requests the Court to issue a certified question or invite en banc or appellate consideration of whether a pro se litigant advancing a deeply sincere, complex, and otherwise underrepresented RFRA claim may recover reasonable labor-based fees under a hybrid equitable doctrine, in light of this claim's public benefit impact and its critical importance to religious minority rights.

## **COUNT VII – Penny Minting Ban and Currency Overhaul Under RFRA**

**(Against Treasury Secretary Bessent, Congress)**

80. Plaintiff incorporates paragraphs 1 through 70 by reference.

1 81. The penny, which bears the unhyphenated sacred Name of G-d, is frequently discarded,  
 2 stepped on, or otherwise mishandled in ways that are inconsistent with Plaintiff's sincerely held  
 3 religious beliefs. Its low value and widespread mistreatment render it unfit for sacred  
 4 designation.  
 5

6 82. The recent administrative pause in penny minting under the Trump/Bessent  
 7 administration represents a meaningful step toward economic rationality and aligns with  
 8 Plaintiff's religious needs. However, such executive action is temporary and reversible, and does  
 9 not provide the durable, legally required relief that RFRA mandates.  
 10

11 83. Plaintiff therefore respectfully requests that this Court:

12 • **Declare** that continued penny production imposes a substantial burden on Plaintiff's  
 13 religious exercise under RFRA;

14 • **Enjoin** the Department of the Treasury from resuming penny minting, absent compelling  
 15 justification and a demonstration that no less restrictive alternatives exist;

16 • **Direct** that existing pennies be redeemable at banks and depository institutions through  
 17 a **gradual and religiously sensitive decommissioning process**, thereby reducing the ongoing  
 18 religious burden;

19 • And recognize Plaintiff's right to religious accommodation from being forced to use or  
 20 handle penny currency in any government-required or civic transaction.  
 21

22  
 23 84. While Plaintiff does not seek to criminally penalize private penny transactions (perhaps  
 24 there can be a Court-ordered or Congressionally-enacted federal commercial civil penalty of \$18  
 25 dedicated to a lifesaving purpose for any penny-involved transactions or issuances, and never  
 26 ever for authentic currency collectors who treasure our currency as worthy of close protection),  
 27 the Plaintiff requests a formal shift in federal policy to immediately more effectively discourage  
 28

penny use and transition to a penniless national economy ideally like Australia (charging to the cent digitally but rounding to the 5 cent piece in cash), and ensure that religious objectors are fully accommodated, in line with RFRA and evolving national currency design policy.

**COUNT VIII – CashAlt Payment Method Commitment or Clarification for Executive Order 14342 and Executive Order 14340 To Prevent 8th Amendment Violating Excessive Bail or Cruel and Unusual Punishment (Against President Donald Trump and Congress)**

85. Plaintiff incorporates by reference paragraphs 1 through 70.

86. The President of the United States is the head of the Executive Branch and possesses the singular authority to issue Executive Orders independent of congressional action. On August 25, 2025, the President issued Executive Order 14342, directing jurisdictions across the United States to apply “cash bail” to certain categories of crimes, including those in the District of Columbia under related Executive Order 14340, a jurisdiction that has adopted cashless bail policies.

87. However, Executive Order 14342 and 14340 fails to specify what constitutes “cash” for purposes of compliance. A narrow interpretation would suggest that “cash” refers only to physical Federal Reserve banknotes and coins. Such a reading places extraordinary pressure on jurisdictions to exclude alternative forms of payment and forces detainees to rely solely on carrying physical currency. In practice, most individuals carry no more than modest sums of cash—typically insufficient to satisfy misdemeanor or felony bail amounts—creating a substantial risk of prolonged pretrial detention. Conditioning release on the form in which an individual’s funds are held violates the principles articulated in *Robinson v. California*, 370 U.S. 660 (1962), which forbids punishment based on status or condition.

1 88. Executive Order 14342 and 14340 particularly burdens Plaintiff, putting him even more  
2 frequently in a Catch-22 with respect to securing his own reliable release from pretrial detention  
3 in any jurisdiction he might be living in, traveling in, or traveling through. Unless clarified, it  
4 empowers jurisdictions such as Miami-Dade and Palm Beach County where he lives—which  
5 already refuse to accept alternative payment methods (“CashAlt”) such as credit or debit cards  
6 or checks—to continue practices that unconstitutionally prolong pretrial detention. This  
7 contradicts the Sixth Circuit’s mistaken assumption in *New Doe Child No. 1 v. Congress of the*  
8 *United States*, 891 F.3d 578, 591 (6th Cir. 2018), that legal-tender requirements never prevent  
9 access to payment across all transaction types, including bail.  
10

11 89. Accordingly, Plaintiff requests that Congress legislate (ideal) or that President Trump  
12 issue a clarifying third Executive Order requiring all jurisdictions nationwide, within a one-month  
13 national grace period, to accept alternative forms of bail payment—credit cards, debit cards,  
14 checks, smartphone or wearable NFC payments, or any other method already used by courts or  
15 the IRS for payment of fees and taxes, along with facilitation of preliminary or supplementary  
16 transactions like brokerage account stock sales necessary to liquidate easily liquidable digital  
17 assets like publicly traded stocks or index funds or, for those that use it, crypto for transfer.  
18 Processing surcharges should be capped at the same rates imposed in courthouse or IRS  
19 transactions. Plaintiff also requests that President Trump include in these Executive Orders a  
20 requirement for jurisdictions to only assess cash bail rather than pure risk-based pretrial release  
21 if the defendant has the reasonable capacity to pay the bail assessed without undue hardship  
22 (FairPay). Those with more resources should have appropriately proportionately higher CashAlt  
23 FairPay bail applied to them; persons without a dime to their names should not be held up in  
24 pretrial detention over cash bail if they do not pose a flight risk or a clear and imminent risk to the  
25 community (eg community) and have not been alleged to commit a heinous or risky crime. For  
26 example, Plaintiff argues that throwing a subway sandwich as Sean Dunn did at short range at a  
27 law enforcement officer’s heavily armored chestplate doesn’t count as a heinous or risky violent  
28

1 crime meant to cause injury or harm. Demonstrably, not all alleged crimes the US Attorney treats  
2 and attempts to classify as violent felonies are actually a risk to the community or law and order.

3 90. Plaintiff would freely and immediately drop President Trump from this lawsuit with such a  
4 third Executive Action and clarification of Executive Order 14342 and 14340. Plaintiff did not  
5 after all originally want to include President Trump as a direct defendant in this lawsuit but it is  
6 necessary now with these two Executive Orders.

7 91. Absent such clarification and muscular federal legal force and compulsion supporting  
8 CashAlt and FairPay to flexibly pay and fairly assess bail in all jurisdictions nationwide, Plaintiff  
9 requests that this Court declare Executive Order 14342 and 14340 illegal and unconscionable  
10 without CashAlt payment methods, violative of the Religious Freedom Restoration Act and  
11 States and delegated Local Rights under the 10th Amendment, and inconsistent with the Eighth  
12 Amendment's prohibition against excessive bail and a punishment based arbitrarily and  
13 capriciously in districts that don't accept AltCash on status by way of religion, funds storage  
14 status, available means-of-payment carried on-person, or separation of the person from the  
15 assistive devices they symbiotically depend on to cover such prohibitive low, medium, or high  
16 sudden "cash" assessments.

17 92. The contents of these Executive Orders I'm discussing in this Count VIII, the third  
18 requested Executive Order, and all the questions surrounding it are in fact more properly the  
19 more permanent and lasting domain of the States under the 10th Amendment and Congress's  
20 express legislative authority and responsibilities, with the Executive merely executing Congress'  
21 decisions and calmpromises (e.g. compromises) and leaving cash bail to the internal affairs of  
22 each State. At the federal level, Congress ought to be the entity conclusively dictating the  
23 necessity of cash bail or lack thereof, and any acceptable payment mechanisms for the same,  
24 not the President whose role is to execute law not dictate it. Congress ought to be ordered by  
25 this Court, if possible, to legislate on which accessible frequently-carried methods of payment  
26 exactly are guaranteed to be accepted nationwide for cash bail beyond mere cash-strict legal  
27  
28

tender that entraps so many cashless carry Americans or Americans who prudently do not carry thousands of dollars of Federal Reserve banknotes on their person for safety reasons, with some instructions from the Court as to what's constitutionally required in terms of payment acceptance flexibility and liquidation and transfer facilitation, with violating or slow-walked jurisdictions under penalty of a truly enforced civil rights statutory violation.

## VII. PROPOSED REMEDIES AND CURRENCY REFORM

### A. Immediate Relief Options

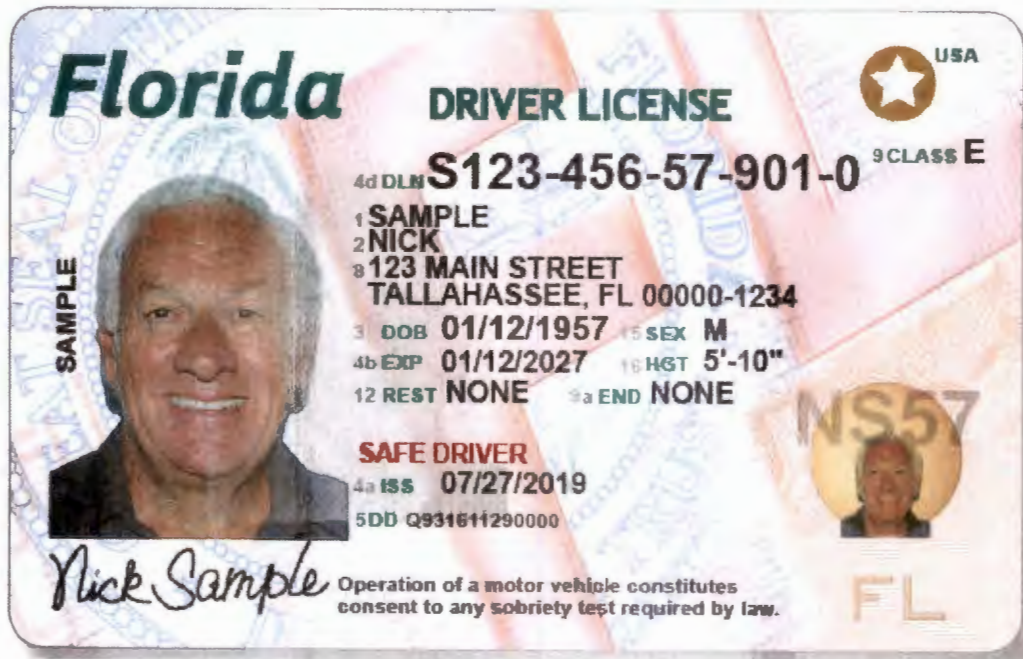
93. The Court should order one or more of the following:

#### **Option 1 (Minimally necessary but not adequate):**

Plaintiff proposes that the Government modify the National Motto on new currency so that it is abbreviated, hyphenated, or otherwise deflected. Acceptable alternatives could include: "In G We Trust," "In G-d We Trust," or "In Good We Trust." Another option would be to print "In G-d We Trust" in a format where the Divine Name is rendered incompletely—such as with the letters cut off at the margin of the design—similar to how the Seal of Florida appears truncated on Florida driver's licenses.

Such a "cut-off" design would sufficiently relieve Plaintiff's RFRA burden if it were to become the overwhelmingly dominant presentation of the motto over time. Under Plaintiff's Judaism, an incomplete rendering of the Name is not sacred, and thus its disposal would not constitute destruction or erasure of the sacred Name. By contrast, a fully intact printing—such as if the

Name were stamped only slightly higher and shown complete—would remain impermissible.



**Figure 1:** Florida Sample Driver's License showing the State Seal, where the Name of G-d is only partially printed faintly at the bottom margin—with a little more than half of the Name of G-d cut off. This demonstrates a RFRA-tolerable design under Plaintiff's American Judaism because the Name is deliberately incomplete and therefore not sacred. In this form, the design can be carried into bathrooms, soiled, dropped, printed on ordinary media, or surrendered to the State for routine destruction at end-of-life without special precautions or ceremonies.



**Figure 2:** The National Motto "In G-d We Trust" engraved into a permanent stone medium above the rostrum at the United States House of Representatives, and a print of the same where the Name of G-d is only partially printed—approximately half cut off. The stone engraving in the House of Representatives or Capitol Building is *not* a RFRA violation of Plaintiff's religious Jewish beliefs, because these engravings are actually permanent and are not carried into bathrooms, dropped onto floors, soiled, shredded, or likely to be destroyed, and elevate or maintain the potency of G-d's Sacred Name. This is not ceremonial superfluous deism; it's state deism simply. At end-of-life, this engraving is very likely to be relocated to a museum and cared for. Further, this printing of the photograph demonstrates a RFRA-tolerable design under Plaintiff's American Judaism because the Sacred Name in the digital photograph was half-covered, here with an International Safety Orange (ISO) rectangle that reads "cutoff digital design = safely printable", making it deliberately incomplete and therefore not sacred when printed. In this form, this print-off can be carried into bathrooms, soiled, dropped, printed on ordinary media, or surrendered to the State for routine destruction at end-of-life without special precautions or religious or

civic religious ceremonies; this print-off needn't be treated like a sacred American or Jewish American (sentinel) flag, thanks to the rectangular overlay. This House of Reps engraving, as prominent state (monotheistic) deism, may pose different problems under the 1st Amendment Establishment or Free Exercise clauses, but this Plaintiff doesn't experience a RFRA violation through it, and this Plaintiff will not challenge these engravings.

While this approach may not represent an ideal solution from a broader pluralism standpoint—balancing concerns of “ceremonial genericide” versus “ceremonial deism”—it does not impose a substantial burden on Plaintiff personally under RFRA, and to Plaintiff's knowledge would be acceptable within all modern streams of Judaism. By contrast, the fully intact Seal of Florida, with the complete Name of G-d stamped on portable, impermanent physical media such as paper or plastic, remains a continuing RFRA problem for Plaintiff when stamped superfluously on secular documents coming into his chain-of-custody.

**Option 2 (Minimally necessary and pluralistically acceptable but not fully adequate achievement of Governmental compelling interest):** Order Congress to redesign motto pluralistically without sectarian content that all faiths and non-faiths can agree on. Plaintiff feels “In G We Trust” would be a great contiguous and compatible choice that bridges Option 1 and 2.

**Option 3 (Most preferred by super-wide margin):** Strike sacred form motto and order/recommend currency naming and design contest for 250th Anniversary, selecting prescriptively meaningful currency title as “national motto” uttered quadrillions of times yearly with promising moral behavioral effects.

## **B. Currency Decommissioning**

1  
2 94. Order Federal Reserve and Treasury to gently decommission<sup>11</sup> unhyphenated currency  
3 starting no later than July 4, 2026, using "Inverse Gresham's Law" to drive sacred form money  
4 from circulation, as already precedentated in American Council for the Blind v. Paulson.

5 95. At the very latest, follow an Apollo-mission accelerated schedule for the release of all  
6 new banknote and coin designs, corresponding to a wait of no more than 6 years, 10 months,  
7 and 8 days before the Bureau of Engraving and Printing (BEP) and US Mint are running at full  
8 production on the newly redesigned cash and coins compatible with Plaintiff's religious beliefs  
9 and coupled to and consistent and compatible with the needs of the blind and visually impaired  
10 in *American Council for the Blind v Paulson*.

### 11 12 **C. Alternative Payment Methods**

13 96. Provide a range of no-fee or very low-fee CashAlt "cashless cash" payment options for all  
14 government services, focusing first on the full range of payment methods that match what  
15 Americans carry on their person on a typical day, and at a minimum including all means of  
16 payment that the Federal Government accepts for the payment of taxes. Then, go further, and  
17 support preliminary or supportive transactions like brokerage assets or other digital asset  
18 liquidable sales to enable and facilitate funds transfer for Governmentally-compelled payment  
19 needs like bail.  
20

### 21 **D. Curtailing Cash Bail**

22  
23 97. Order immediate nationwide bail reform allowing a variety of fair non-cash (non-tender)  
24 options and detainee access to the means to pay using checkbooks, credit cards, debit cards,  
25 and electronic funds. In greater depth:  
26  
27

<sup>11</sup> The Plaintiff is well aware that this process must be done very gently and incrementally. We would not want a repeat of the chaos and cash shortages that happened in India's poorly planned 02016 Indian banknote demonetization.

1 98. The Government's position, as embodied in President Trump's Executive Order 14342  
2 ("Taking Steps To End Cashless Bail To Protect Americans"), is both logically confused and  
3 constitutionally unsound. Where a defendant poses a real and present danger to the community,  
4 an imminent risk of flight, or is charged with an offense of such gravity (e.g., homicide) that  
5 pretrial release is inappropriate, the proper remedy—consistent with Illinois' guidelines—is to  
6 deny release outright. In such cases, cash bail is superfluous; strictly enforced detention, not the  
7 threat of property confiscation, determines safety.  
8

9 99. Conversely, when the offense is relatively minor—for example, the defensive use of  
10 pepper spray against a violent assault by law enforcement, as I once experienced, or an ex-DOJ  
11 employee throwing a sandwich at a —the question of release should not turn on whether the  
12 defendant is rich or poor, whether their personal effects are accessible at booking, or whether  
13 they or their friends can circulate "In G-d We Trust" legal tender at the jailhouse counter. The  
14 proper inquiry is limited to the seriousness of the charge, the risk posed to the community, and  
15 the likelihood of appearance in court. Cash bail only introduces arbitrary and discriminatory  
16 factors into that determination.

17 100. Where a judge or grand jury has found a defendant releasable under the presumption  
18 of innocence, liberty cannot be conditioned on personal wealth, social connections, or the  
19 happenstance of daily personal carry immediate access or religious freedom to use to  
20 legal-tender banknotes. Nor may it be obstructed by policies forbidding modern payment  
21 methods such as credit cards, debit cards, or checks. Any system that restricts release to those  
22 who can raise physical cash operates as economic discrimination against the poor and religious  
23 discrimination against those whose faith forbids circulation of "In G-d We Trust" currency.  
24

25 101. The rule must be binary: either release is warranted, or it is not. Cash bail does not  
26 make a dangerous person safe, nor should it keep safe persons jailed. Where release is proper,  
27 legal-tender requirements have no role. Jurisdictions must instead employ non-discriminatory,  
28

1 practical mechanisms to ensure appearance and public safety, including modern payment  
2 systems if financial obligations are justified.

3 102. If governments choose to impose surety bonds on defendants with demonstrable  
4 means, the Plaintiff agrees that courts may permit such conditions—so long as they are  
5 reasonable, non-excessive, proportionate to the individual's resources, payable through a range  
6 of convenient and common payment options, capable of being arranged directly without the  
7 unnecessary expense of lawyers or bail bondsmen or impose a dependency on  
8 sometimes-unfairly-unreliable social or community support, and can be conducted without  
9 violating that person's religious beliefs. What bail may not do is penalize poverty, religious  
10 conscience, or protest (solitary or communal).

12 103. As *Robinson v. California*, 370 U.S. 660 (1962), makes clear, punishment cannot be  
13 inflicted on the basis of status, condition, or belief. Likewise, the Eighth Amendment's ban on  
14 "excessive bail" should encompass any condition that is effectively unpayable—whether due to  
15 indigency or because religious conscience prohibits the use of legal tender. To insist otherwise  
16 entrenches unlawful discrimination and, in my case, compels desecration of the Divine Name  
17 when sacred banknotes in my lifetime-chain-of-custody are destroyed unceremonially upon  
18 deposit by the Federal Reserve (or otherwise defiled or degraded).

19 104. The constitutional framework is simple: if a defendant is dangerous, please detain  
20 them. If not dangerous or not clearly or convincingly as weighted by crime type, risk of reoffense,  
21 and risk of nonappearance, release them under reasonable conditions given that their innocence  
22 must properly be assumed, including bonds payable through a range of modern, accessible  
23 methods ("Easy and Fair Pay"). Liberty cannot or should not lawfully be tethered to cash, to  
24 arbitrary jail policies, or to the accidents of wealth, religion, or social ties.

## 26 **E. Additional Accommodations**

27  
28

105. Accommodate religiously neutral practices like ordering the removal of the full form of the sacred Name from passports, state licenses, and state seals stamped on paper and other destructible media not cared for and protected adequately.

106. Grant relief including regular mediation with Executive Branch officials until all parties agree that a Settlement of this is reliably and enforceably in the works and/or complete.

107. In light of the demonstrated role that Large Language Models (LLMs) have played in drafting this Complaint, Plaintiff respectfully urges the Court to consider that detainees falling within the scope of 13th Amendment—exempted incarceration should be granted regular access to LLM tools for the purpose of civil rights advocacy and legal self-representation. This case itself illustrates the point: it could not have been effectively brought had Plaintiff first been detained and forced to litigate from jail or prison without meaningful access to LLM assistance to support legal writing and to render arguments in a form more readily cognizable to the judiciary.

## **F. Currency Naming Contest Proposal**

108. For the 250th Anniversary of Interdependence (July 4, 2026), establish a national contest for new currency names with deeper and more naturally rooted moral resonance and mission than the name "dollar". Plaintiff proposes initial candidates in **Appendix C**.

109. Currency retitling would create profound behavioral economic effects. Imagine: "I want to earn a lot of CALM when I grow up" or "I need more CALM to keep up with inflation" or asking for "a little calm" when in need.

110. Let Congress or the Courts authorize an open contest in the free marketplace of ideas by holding a federal ranked-choice vote during the midterm Presidential elections to determine which currency title should serve as our commercial "major motto." Such a process would advance the government's compelling interests through the least restrictive means while offering the nation valuable practice in the use of ranked-choice voting.

111. Because the subject matter is largely harmless, the exercise of picking a "title-level motto" would provide a safe and constructive opportunity for Americans nationwide to experience how ranked-choice systems can identify a broadly supported consensus outcome—something less likely under our current duopolistic, first-past-the-post, only-one-chance-to-pick system we use for federal office candidates described by Duverger's Law, where vote spoilage is a constant serious threat to getting your underlying ranked preferences heard and counted. By engaging in a rational and inclusive ranked-choice process for something as symbolic yet culturally significant as the title on our currency for the next 50 - 250 years, the public may develop a greater appetite for extending ranked-choice voting to elected judicial offices, political positions, and federal ballot referendums. The result may be stronger and more richly informed psychographically-representative representation at the center, more constructive compromise—or "calmpromise"—and a healthier, less polarized democracy.

## 15 **G. Plastic Currency Transition**

112. Adopt durable plastic currency like Australia, Canada, UK for:

- 17 a. Longer lifespan (reducing sacred name destruction)
- 18 b. Environmental benefits
- 19 c. Enhanced security features
- 20 d. Hygiene improvements
- 21 e. Beautiful redesign opportunities

## 23 **H. Presidential Candidacy Consideration**

113. Plaintiff is running as a Precedential (Presidential) candidate for Harmless Hands in 2028. However, Plaintiff cannot serve if tasked with printing and desecrating sacred currency. The current Ouroboros of sacred form cash destruction limits Plaintiff's ability to serve in executive office.

114. No citizen should be barred from serving as President—or “Precedent”—of the United States due to religious conflicts arising from assuming leadership in any Government position, such as the incapacity Plaintiff currently has to be anywhere within or under the chain of command or delegation of powers connected to currency design, printing, minting, and destruction. That principle should be self-evident, and indeed should have been clear from Plaintiff’s pleadings in New Doe Child No. 1 in 2018, but here I make it more evident and transparent. Different faith traditions cannot converge on a single safely printable and regularly circulable common divine reference: Muslims may prefer “In All-h We Trust”; Jews require a hyphenated form or removal altogether; many Christians insist on the unhyphenated vernacular, or even a more specific “In Jesus We Trust”; Hindus might naturally prefer “In Gods We Trust”; and Atheists or Agnostics would prefer a secular alternative such as “In Good We Trust.” The Plaintiff proposes a calmpromise on “In G We Trust”, along with deeper, broader currency reform to meet compelling governmental interests, but is open to any other alternatives Congress reflects and decides on that are not early-Hasmonean and do not directly violate his faith.

## VIII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests this Court:

**A. DECLARE** government policies violate RFRA, First Amendment, Fifth Amendment, and Eighth Amendment;

**B. ENJOIN** printing/minting unhyphenated sacred name on currency and documents;

**C. REQUIRE** government provide cashless no-fee or very low-fee alternatives for all payments;

**D. MANDATE** cash bail reform with true electronic payment accessibility and facilitation, including consideration of the described “Jail Mode” on phone operating systems and banking,

1 digital payment, and brokerage apps for prisoner-slave (detainee) smartphones so that we can  
 2 effectuate electronic payment without needing to carry hundreds or thousands of dollars of  
 3 physical cash or rely on prohibitively expensive bail bondsmen to secure our own freedom when  
 4 our core freedom is at stake and the timeliness of our release from pretrial detention affects  
 5 whether our life further unravels;  
 6

7 **E. ENJOIN** Government from minting further pennies immediately (or until redesigned with "In G  
 8 We Trust" or "In Good We Trust" or "Out of Many One" or some other motto);  
 9

10 **F. ORDER AND ENCOURAGE** competitive currency redesign contest for civic religious motto  
 11 and ideally also a prescriptive currency name with much greater force than the *sotto voce* motto  
 12 by July 4, 2026;  
 13

14 **G. ORDER** currency be readily and easily distinguishable between sacred (prejudgment) and  
 15 civic (postjudgment) versions per American Council for the Blind precedent;  
 16

17 **H. ORDER** Plaintiff's privacy rights restored through cash currency access;  
 18

19 **I. ORDER** nationwide reform allowing cashless bail payment and detainee fund access;  
 20

21 **J. GRANT** unconditional permission to cut the motto or more narrowly the Name of G-d from  
 22 banknotes so that the Plaintiff can religiously protect those printings of G-d's sacred name in the  
 23 interim, allowing for the remaining banknote to be deposited freely as needed without  
 24 prosecution for currency mutilation under 18 U.S.C. §333;  
 25

26 **K. ACCOMMODATE** other religiously neutral practices consistent with RFRA and the  
 27 Constitution, like ORDERING the United States Passport to be printed without the unhyphenated  
 28 Name of G-d to be printed within it (replacement with "In Good We Trust" or "In G We Trust" or  
 any other *Civic Motto* is perfectly functional and acceptable), and ordering all state driver's  
 licenses and state seals nationwide, or at the very least in the States within which Jews and the

1 Plaintiff reside (read: all States, or at least those States where any hyphenating Jew steps  
 2 forward in any form to object to the sacred form on driver's licenses and state seals), to have the  
 3 unhyphenated Name of G-d be removed from all printed official designs, all in order to  
 4 desacralize our secular identity documents and seals that we must carry with us through our  
 5 daily and periodic secular activities, and make secular document and security document disposal  
 6 and destruction feasible without desecrating the Name of G-d and committing the Government  
 7 (local, state, or federal) to the ongoing long-tail burden of enforcing religiously consistent sacred  
 8 form burial as a disposal requirement.  
 9

10 **K. AWARD** reasonable pro se fees of \$18,000 for this very highly complex case, and now also  
 11 for the pain, anxiety, suffering, and reputational harm caused by the Government's obstructive  
 12 attempts to label me unfairly and prematurely with a seemingly deliberately misleading factual  
 13 record as a vexatious litigant;  
 14

15 **L. GRANT** other relief deemed just and proper.

16 Please forgive Plaintiff for not optimizing further, as time is limited.  
 17

18 That's the end of my core legal case. I believe I have pleaded the facts sufficiently herein with  
 19 sufficient legal standards and precedents on all counts and will be happy to submit more  
 20 evidence of "thousand papercut" commercial harms in discovery as wanted or needed.  
 21

22 But I want to spend just two pages here and the appendices offering a creative opening to the  
 23 Government to make use of this design crisis as an opportunity to redesign currency more  
 24 broadly, helping make our currency sacred without infringing on or arrogating the sacredness of  
 25 G-d's Holy Name.  
 26

27 If the Government wishes to elevate our currency to a sacred place in our commerce, it can do  
 28 so in a much less harsh, more functional, and much less restrictive manner more puralistically,

and more logically by changing the national motto to stop arrogating the sacred Name of G-d while also changing the name of our currency from the low-linguistic-meaning, teachable-moment-wasting "Dollar" title (from the "Valley" linguistic family of ancient and mostly forgotten language mutations -- tracing back through Daaler, Daler, Thaler, Taler, Thal, Joachimstaler/Joachimsthal (originally the "Joachim's Valley coin")) to a term with moral injunctive prescriptive direction in daily commerce with baked-in resonantly active double entendres like "Trust", "CALM", "QALM", "ALMS" (ALMS acronym: American Life Moments, Minutes, Months, with baseline "alms" philanthropic meaning and value) or any better competing alternatives the public can dream up in a Quarter-Millennial renaming contest (see below proposal), scheduled prospectively to recur every 250 years on the anniversary of our Nation's Independence from (and early Interdependence with) Old World traditions. Here are some highly conservative design alternatives with a range of competitive names, including two at the bottom that are blank for your own imagination to fill:



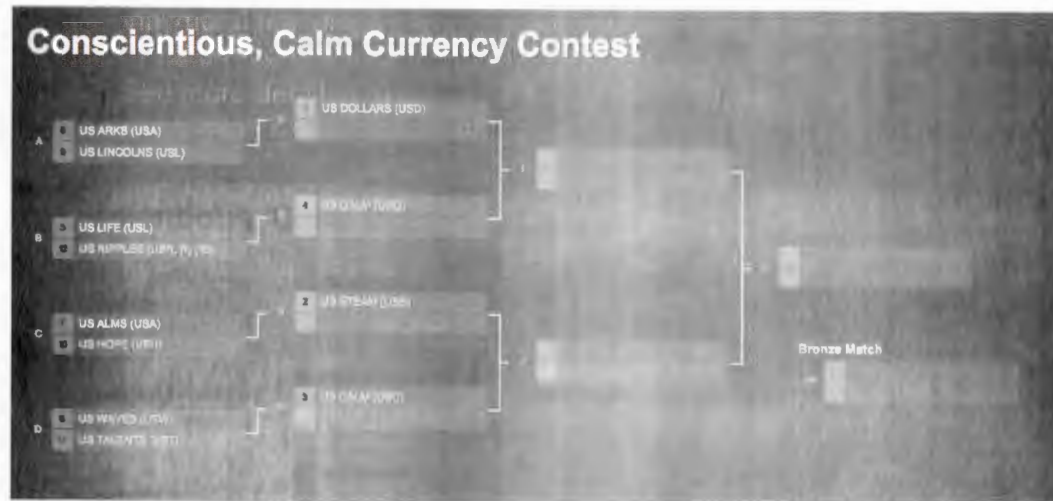
Row 1: TEN CALM, TEN QALM, TEN ALMS

Row 2: TEN TALENTS, TEN TRUST, TEN DEEDS

Row 3: TEN SEEDS, TEN WAVES, TEN STEAM

Row 4: blank, TEN GOODS, blank

These names can compete in a public tournament or extended Congressional debate for the name with the most long-lasting moral resonance, a currency title that reinforces national and international moral teachings and economic morale. Here is one such sample tournament bracket. See more detail in Appendix F.



**WHEREFORE**, the Plaintiff pleads and prays for such relief and such reform.

Working to preserve life and death and religious liberty,

  
 s/Plaintiff David Clayman, Currently *Pro se*  
 7930 Palacio Del Mar Drive  
 Boca Raton, FL 33433-4148  
 +1 (321) 252 - 9626  
 david@clayman.org  
 david@ingwetrust.org  
 david@inhashemwetrust.org

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this Tuesday, the 2nd day of September, 2025, I mailed a copy of this document to the Court via certified mail and electronically served a copy of this response to the new and old opposing counsel on the case.

  
/s/ David M. Clayman

Pro Se Plaintiff

## APPENDICES

Note: Any receipts and photos I have further supporting and establishing "thousand papercut" injuries I would be happy to produce in Discovery on request.

### Core Appendices

- A. Cultural and Religious Practices Surrounding Shaimos
- B. Jewish History and Talmudic Basis
- C. Detailed Slides on Talmudic Tractate Rosh Hashanah 18B
- D. "Why Write "G-d" Instead of "G-o-d"? by Yehuda Shurpin of Chabad.org
- E. Article from Times of Israel, January 25, 2023: "Shas bill: Add 'In G-d we trust' to banknotes as 'talismans for economic success'"
- F. Discussion of Future Potential Arrest Risk
- G: Executive Order 14342 "TAKING STEPS TO END CASHLESS BAIL TO PROTECT AMERICANS"
- H: Executive Order 14340 "MEASURES TO END CASHLESS BAIL AND ENFORCE THE LAW IN THE DISTRICT OF COLUMBIA"
- I: Religious Accommodation RE: Miami-Dade Cashless Business Ordinance (Unanswered Email)
- J: Bylaws of David Clayman of Lifesaver Labs for Precedent & President (SEE

### Additional Appendices

- A Design Contest for Achieving Compelling Government Interest With Least Restrictive Means, Maximal Civic Religious Values, Accommodation for the Blind and Visually Impaired, And No Future Substantial Sectarian Religious Burden
- K. Proposal for Complete US Currency Redesign to Better Meet Compelling Government Interest
  - L. Honoring President Roosevelt (Roseavelt) With a Proposal for Revived American American Simplified Number and Spelling System
  - M. 2015 Currency Renaming Proposal: Crime-fighting, Conscientious Capital: A Quarter-Millennial Currency re:christening (Naming) Contest

### Scientific Studies

- N. "Bail Reform and Public Safety: Evidence from 33 Cities." Brennan Center for Justice. August 15, 2024

## **APPENDIX A: CULTURAL AND RELIGIOUS PRACTICES SURROUNDING SHAIMOS**

### **Hyphenating the Name of G-d**

In Jewish tradition, the name of G-d is treated with the utmost respect and reverence. This respect extends to the written form of G-d's name in any language, including English. To prevent the desecration or destruction of G-d's name, many Jews use a hyphenated form (e.g., "G-d") when writing the name in non-sacred contexts. This practice ensures that if the written material is discarded, it does not desecrate the sacred name.

### **Shaimos and Document Lifecycle**

Shaimos refers to sacred texts or documents containing the name of G-d that can no longer be used. Jewish law mandates that such documents be treated with respect and disposed of through burial in a genizah (a repository for sacred texts) rather than being discarded in ordinary waste streams.

1. **Protection During Use:** Sacred writings must be safeguarded to prevent defacement or damage.

2. **End-of-Life Practices:** When documents containing the name of G-d are no longer in use, they are carefully stored and eventually buried in accordance with religious customs.

3. **Application to Currency:** For observant Jews, currency bearing the name of G-d falls under these practices. The routine shredding or destruction of such currency by secular authorities creates a significant religious conflict.

### **Religious Basis**

1  
2 The obligation to preserve the sanctity of G-d's name is rooted in Jewish scripture and law,  
3 including the Third Commandment ("You shall not take the name of the Lord your G-d in vain")  
4 and rabbinic teachings. These principles underscore the profound significance of treating any  
5 representation of G-d's name with care and reverence.

6  
7 By hyphenating the name of G-d and adhering to *Shaimos* laws, Jews ensure compliance with  
8 these religious mandates while navigating the challenges of modern secular life. Plaintiff's  
9 adherence to these practices forms the foundation of this case.

10 If you want to learn more, search online for "Why do Jews hyphenate the Name of G-d?" You'll  
11 find hundreds of sources explaining Jewish religious and cultural practices on this. The  
12 application to US currency is fairly novel but a very natural, logical, necessary extension of  
13 extremely common practices millions of American Jews like me have.  
14

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## **APPENDIX B: JEWISH HISTORY AND TALMUDIC BASIS**

### **Historical Context**

The Jewish tradition of avoiding unnecessary destruction of sacred texts originates from the Hasmonean period, as detailed in Talmudic literature. During this era, excessive use of G-d's name on secular documents led to its desecration. The sages, recognizing the gravity of this issue, implemented measures to protect the sanctity of G-d's name.

### **Talmudic References**

In the Babylonian Talmud, Tractate Rosh Hashanah 18b, the sages recount an incident where debt documents included the name of G-d. The practice was condemned because these documents, upon repayment, would be discarded improperly, leading to desecration. The sages abrogated this practice and declared the date a celebratory occasion to honor their decision to safeguard the sanctity of G-d's name.

### **Key Principles Derived**

1. **Sanctity of Written Names:** Any written representation of G-d's name is inherently sacred and must be protected.
2. **Prevention of Desecration:** Measures must be taken to avoid circumstances where sacred writings could be desecrated, even inadvertently.
3. **Application to Modern Contexts:** The principles outlined by the sages are timeless and apply to contemporary practices, including the use of G-d's name on currency and official documents.

### **Relevance to Plaintiff's Beliefs**

1  
2 The Talmudic precedent establishes a clear religious obligation to prevent the improper  
3 destruction of documents bearing G-d's name. Plaintiff's beliefs and practices are firmly rooted in  
4 this historical and theological framework, underscoring the legitimacy of his claims.  
5  
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**APPENDIX C: Detailed Slides on Talmudic Tractate Rosh Hashanah 18B**

**APPENDIX D: "Why Write "G-d" Instead of "G-o-d"? by Yehuda Shurpin of  
Chabad.org**



# **Talmudic Tractate**

## **Rosh Hashana, Page 18B**

Hasmonean Dynasty Jewish History and Law vs. The US Department of Treasury

# Here's Page 18B of Talmudic Tractate Rosh Hashana...

- The Talmud is part of the tradition of Jewish Oral Law
- There are 37 Books of the Talmud, and each Book is called a Tractate
- All Orthodox Jews consider the Talmud binding oral law



## First, Some Context on the Passage

*The Talmud is not written like your standard expository text: it's written like a record of an argumentative debate between competing rabbinic perspectives in the course of setting law, and it is highly digressive, and the digressions are often tangential to the point they're instantly trying to make.*

*This gem about protecting G-d's Name is buried in one such tangential digression, during a debate about how to set the Rosh Hashana Celebration, the Jewish New Year, correctly on the Jewish Calendar. Rosh Hashana is supposed to always fall on the 1st and 2nd of Tishrei, Tishrei being the first month of the Jewish Calendar, but with some exceptions. The Rabbis argue exhaustively for many pages about how to schedule Rosh Hashana in every conceivable circumstance: when in Israel Rosh Hashana is 1 day... when out of Israel it is 2 days... when there's a new moon you reschedule... it goes on and on and on...*

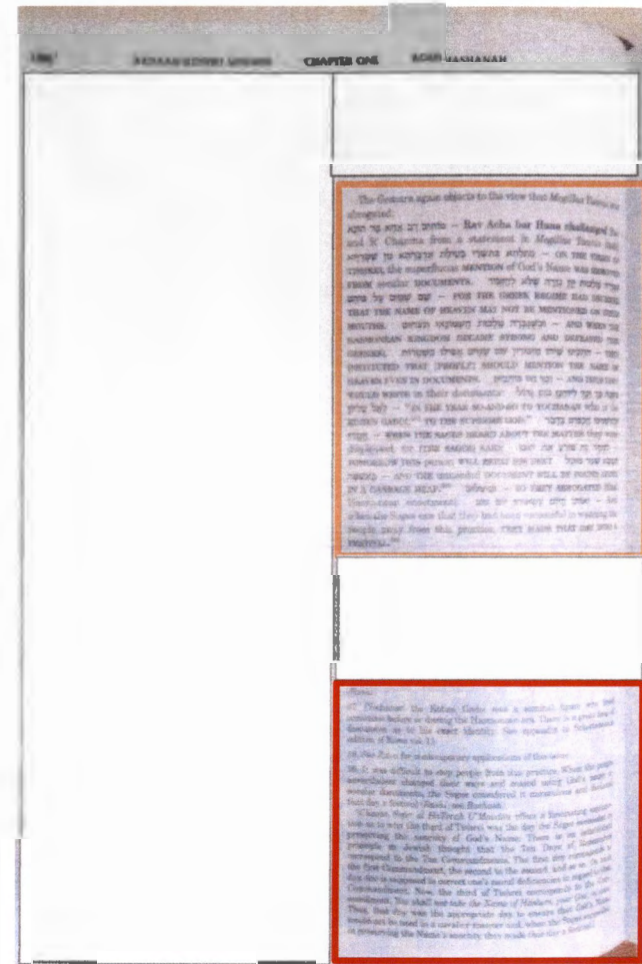
*As they argue this and flesh this out like only calendar wonks can, the Rabbis digress and tell us that there's **already** a feast holiday scheduled for the 3rd of Tishrei, a holiday that celebrates miraculous community-wide adherence to the protection of G-d's Name. It's this moment in Jewish history that has bearing on the case. They're mentioning this in Tractate Rosh Hashana because it could, in one way or another, affect (or be affected by) the calendar dates of the first or second day of Rosh Hashana.*

*(FYI: The 3rd of Tishrei you'll hear about is no longer a festival day in modern times, but a fast day instead, as a means of mourning the assassination of a beloved Governor of Judea named Gedaliah who was killed on the 3rd of Tishrei. Nonetheless, it was once a feast day, and but for the even more tragic Fast of Gedaliah, might remain a feast day today.)*

# What Do I Focus On?

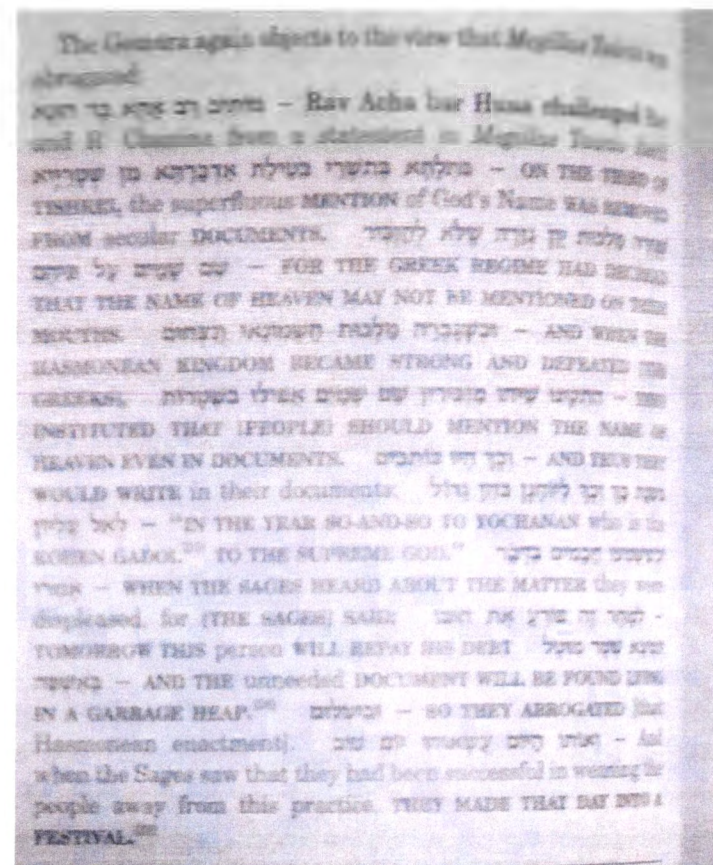
Only focus on the boxed passages magnified in the following slides.

- The Core Passage is in **Orange**, on Slide 5
- The Footnotes are in **Red**, on Slide 6 (and are so important and emphatic, you should practically memorize them too, if you can.)
- Everything that is not, for your purposes, relevant is blocked off in Off-White



## Page 18B: "The Smoking Gun"

ON THE THIRD OF TISHREI, the superfluous MENTION of G-d's Name WAS REMOVED FROM secular DOCUMENTS. FOR THE GREEK REGIME HAD DECREED THAT THE NAME OF HEAVEN MAY NOT BE MENTIONED ON THEIR MOUTHS. AND WHEN THE HASMONEAN KINGDOM BECAME STRONG AND DEFEATED THE GREEKS, THEY INSTITUTED THAT (PEOPLE) SHOULD MENTION THE NAME OF HEAVEN EVEN IN DOCUMENTS. AND THUS THEY WOULD WRITE in their documents: "IN THE YEAR SO-AND-SO TO YOCHANAN [37] who is the KOHEN GADOL TO THE SUPREME G-D." WHEN THE SAGES HEARD ABOUT THE MATTER they were displeased, for [THE SAGES] SAID TOMORROW THIS person WILL REPAY HIS DEBT AND THE unneeded DOCUMENT WILL BE FOUND LYING IN A GARBAGE HEAP. [38] SO THEY ABROGATED [that Hasmonean enactment] And when the Sages saw that they had been successful in weaning the people away from this practice, THEY MADE THAT DAY INTO A FESTIVAL. [39]

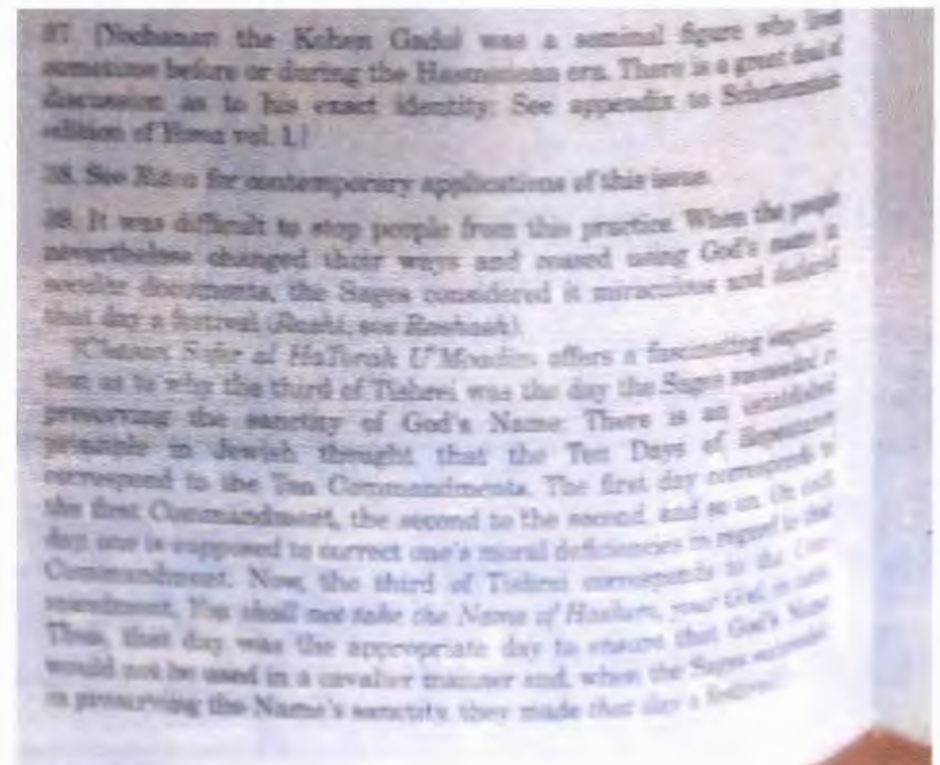


## Footnotes 37 and 39

37. [Yochanan the Kohen Gadol was a seminal figure who lived sometime before or during the Hasmonean era. There is a great deal of discussion as to his exact identity: ....]

39. It was difficult to stop people from this practice. When the people nevertheless changed their ways and ceased using G-d's name in secular documents, the Sages considered it miraculous and declared that day a festival (*Rashi*; see *Rashash*).

[*Chasan Sofer al HaTorah U'Moadim* offers a fascinating explanation as to why the third of Tishrei was the day the Sages succeeded in preserving the Sanctity of G-d's Name: There is an established principle in Jewish thought that the Ten Days of Repentance correspond to the Ten Commandments. The first day corresponds to the first Commandment, the second to the second, and so on. On each day one is supposed to correct one's moral deficiencies in regard to that Commandment. Now the third of Tishrei corresponds to the Commandment, *You shall not take the Name of Hashem, your G-d, in vain*. Thus, that day was the appropriate day to ensure that G-d's Name would not be used in a cavalier manner and, when the Sages succeeded in preserving the Name's sanctity, they made *that day* a festival.]



## Did you read Footnote 39?

“It was difficult to stop people from this practice...”

They declared a **Jewish holiday** when the printing of the Hasmonean Edition of IGWT finally stopped, and the name was no longer being thrown into dung-heaps, or printed into superfluity. It was *that important*.

Likewise, it's my belief that the Jewish People will celebrate the end of IGWT Printing as an appropriate step toward the sanctification of G-d's Name. Finally, the Department of Treasury will stop using the Name of G-d in vain, and shredding the Name of G-d in machines made by Giesecke & Devrient a German firm that *printed currency for the Third Reich* and printed the tickets to the 1936 Berlin Olympics, and still hasn't been open with the public about the extent of its collaboration with the Nazis. That G&D machines are those that are destroying the Name of G-D makes this, for me, especially poignant and devastating, and even more unacceptable as a cultural practice.

I'll celebrate the day a favorable decision is upheld in the Supreme Court lifelong as a feast day.

## Relevant History

The Seleucid Greeks ruled the Jewish nation of Palestine until the Maccabean Revolt of 167 - 160 BCE. The Maccabean Jews regained semiautonomous control of the land, which led to two holidays: the holiday that marked the day the Name of G-d was no longer superfluously destroyed (3rd Tishrei), and secondly, the better-known holiday of Hanukkah.

### Sources

Wikipedia ["Maccabean Revolt"](#), ["Hasmonean Dynasty"](#),

Babylonian Talmud, Stone Edition, Tractate Rosh Hashana 18B

# Why Write "G-d" Instead of "G-o-d"?

By Yehuda Shurpin

Chabad.org, like many Jewish print and online publishers, is particular to not spell out the name of our Creator, even in English. Rather, we write "G-d."

Here's why: Following the Torah's instruction to "obliterate the name" of idolatry in the Land of Israel,<sup>1</sup> the Torah warns us not to do the same to G-d. We thus learn that there is a prohibition to erase G-d's name.<sup>2</sup> Writing G-d's name could lead to erasing or disrespecting G-d's name, as will be discussed.



Art by Rivka Korf Studio

## Foreign Languages

While it is clear that this prohibition applies to the names of G-d written in Hebrew,<sup>3</sup> the question is whether it applies to foreign languages, such as English.

Some opinions understand that this prohibition extends to all languages.<sup>4</sup> Others limit the prohibition to Hebrew; however, they agree that one should avoid erasing G-d's name in foreign languages if possible.<sup>5</sup>

## Respect

Even those who do not consider erasing G-d's name in a foreign language to be a technical violation agree that there is another issue to contend with: disrespect. All agree that the name must not be treated (or defaced) in a disrespectful manner.

To give some perspective, Rabbi Schneur Zalman of Liadi, when discussing the laws of mentioning G-d's name in a place of filth, explains the concept this way:

Names that refer exclusively to the Holy One, blessed be He, i.e., the seven names that may not be erased, may not be mentioned in such places [e.g., bathroom or place of filth] — even in a secular language, such as any name by which the Holy One, blessed be He, is called by any nation in any language (such as Gott in German, or Boga in Polish or Russian). No holiness attaches to the written forms of these secular names for G-d and it is permitted to erase them. Nevertheless, it is debasing to mention them in a place of filth.

[To cite a parallel:] mentioning the name *Shalom*. This name, too, may be erased. Nevertheless, since it is used as a name for the Holy One, blessed be He—albeit not exclusively—it is forbidden to mention it [in a bathhouse] when one is referring to the concept of peace, as explained in sec. 84[:1]. How much more so does this apply with regard to the names designated for Him in non-Jewish languages . . .<sup>6</sup>

Why must one be so careful not to disrespect these foreign language names of G-d? Because if one recites a blessing in a foreign language using one of these names, the blessing is considered valid. This is despite the rule that “any blessing that doesn’t include G-d’s name is invalid,”<sup>7</sup> thus indicating that these foreign names are manifestations of the Divine name.

So even if you can technically erase G-d’s name written in a foreign language, you still need to treat it in a respectful manner.

Due to this, when religious Jewish newspapers were first printed in pre-Holocaust Europe, many adopted the practice to follow the more stringent opinion and hyphenate the name of G-d, lest at some stage these pages be treated disrespectfully.<sup>8</sup> This practice now extends to all articles, newspapers or magazines printed in Yiddish, English or any other language. However, in sacred texts, the name of G-d is often spelled out in full, since the presumption is that such books will be treated with respect.<sup>9</sup>

Although some of these concerns may not apply to a digital copy or computer screen, we are still careful to hyphenate Divine names written in foreign languages online, not only out of extra reverence for G-d’s name where it may not be technically required, but also since it is very common, especially for Jews (because of Shabbat), to print out these articles to read later.

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Divine Names

G-d

## FOOTNOTES

1. Deuteronomy 12:3-4.
2. Talmud, Shavuot 35a.
3. See *Shulchan Aruch*, *Yoreh De'ah* 276:9
4. See *Urim Vetumin* 27:2; *Pischei Teshuva*, *Yoreh De'ah* 276:11
5. See *Shach*, *Yoreh De'ah* 179:11.
6. *Shulchan Aruch*, *Orach Chaim* 85:3 (also quoted in *Mishnah Berurah*, ad loc.); see also *Igrot Kodesh*, vol. 7, p. 26, that this is the explanation for writing “G-d” with a hyphen.

7. Talmud, Berachot 40b; *Shulchan Aruch Harav*, See *Achiezer Responsa*, vol. 3:32; *Shulchan Orach Chaim* 214:1. *Menachem*, vol. 5, pp. 217-18.
8. See, for example, *Achiezer Responsa*, vol. 3:32.

## By Yehuda Shurpin

A noted scholar and researcher, Rabbi Yehuda Shurpin serves as content editor at Chabad.org, and writes the popular weekly Ask Rabbi Y column. Rabbi Shurpin is the rabbi of the Chabad Shul in St. Louis Park, Minn., where he resides with his wife, Ester, and their children.

## More from Yehuda Shurpin

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**APPENDIX E: Article from *Times of Israel*, January 25, 2023: "Shas bill: Add 'In G-d we trust' to banknotes as 'talisman for economic success'"**

Haredi MKs point to use of phrase on US dollar bills, say addition will be good luck charm for national finances; Liberman: 'Interesting way to battle the cost of living'

By [Tol Staff](#)

25 January 2023, 9:28 am

Share



Illustrative: 100 shekel banknotes, seen December 31, 2017. (Nati Shohat/Flash90)

Several Shas party MKs submitted a bill on Tuesday proposing that all banknotes issued by the Bank of Israel include the Hebrew phrase for "In G-d we trust."

The proposal uses the word "Hashem" as a substitute to avoid the Jewish taboo of deleting an actual name for G-d when written down.

The ultra-Orthodox party claimed the addition of the phrase should not be a problem to include on the banknotes and would not harm anyone if it were added.

It was the latest in a series of bills by Haredi parties that are increasing religious overtones to public life. Critics say the moves are changing the balance between religion and state.

A preamble to the bill explained that the Jewish people have a "clear and simple belief that everything is blessed by G-d, including economic abundance." It quoted a phrase from Psalms that implores G-d to "Open your hands and satisfy the desire of every living being."

"Therefore, it is important to be grateful to G-d and to express that faith on the banknotes of the State of Israel," the bill stated.

The authors of the legislation highlighted the fact that United States dollars have the phrase "In G-d we trust" printed on them — adding the suggested Hebrew phrase would be "a talisman for the economic success of Israel," they said.

The phrase is in fact the official motto of the United States.



'In G-d We Trust' is engraved in stone above a US flag in the House of Representatives chamber at the Capitol in Washington on March 1, 2022 (Sarahbeth Maney/The New York Times via AP, Pool)

It is not clear if the coalition will back the bill, the Ynet news site reported.

# ADVERTISEMENT

The government's position on the matter will be decided if the bill reaches the ministerial committee for legislation, the report said.

Leader of the staunchly secular opposition Yisrael Beytenu party MK Avigdor Liberman, a former finance minister, mocked the proposal as "an interesting way to battle the cost of living."

"What next? Will they ask to put a picture of Deri on each banknote?" he tweeted referring to Shas leader Aryeh Deri, dismissed by Prime Minister Benjamin Netanyahu earlier this week after the High Court of Justice barred his return to ministerial office in light of his past financial crimes and apparently broken pledge to leave political life.



Yisrael Beytenu party chairman Avigdor Liberman speaks during a faction meeting at the Knesset in Jerusalem on January 16, 2023. (Olivier Fitoussi/Flash90)

Before entering office, Finance Minister Bezalel Smotrich suggested that the laws of the Torah would dictate his economic approach.

1 "If we follow the Torah," Smotrich said, "we'll be rewarded with financial abundance and a great blessing.  
2 That will be my economic approach."

3  
4 On Tuesday, lawmakers from United Torah Judaism, another ultra-Orthodox party in the government,  
5 submitted a bill to provide [gender-segregated bathing hours](#) at natural springs in the country's national  
6 parks.

7 That bill followed one a day earlier that would make it prohibited to bring leavened goods, or hametz, into  
8 hospitals during the Passover holiday.

9 Netanyahu leads a right-wing, religious coalition with parties that made  
10 far-reaching demands during negotiations to join the government. Critics say  
11 Netanyahu compromised on many issues that will upset the status quo  
12 between religion and state.

## APPENDIX F: DISCUSSION OF FUTURE POTENTIAL ARREST RISK

The Plaintiff acknowledges that his political and religious advocacy—specifically, among other things, for a lawful, Congressionally-sanctioned accountability framework that may include assassination of unduly deadly or genocidal political leaders—could invite prosecutorial misinterpretation or overreach under statutes such as 18 U.S.C. §§ 871 and 878.

The Plaintiff argues this speech is constitutionally and religiously protected. As an American Jew, the Plaintiff has a duty to prevent the emergence of another Hitler (causing 85,000,000 direct and indirect deaths), even at the milli-Hitler ( $m\text{Hitler}$  = 85,000 deaths and multiples thereof) or meaningful micro-Hitler levels ( $\mu\text{Hitler}$  = 85 deaths and multiples thereof).

The Plaintiff is campaigning to make the  $\mu\text{Hitler}$  and  $m\text{Hitler}$  International Scale of Lethal Intervention a rational, openly enforced interventional policy of the US Congress and Executive Branch. To detain him under strict-cash bail for such advocacy would convert protected religious and core political expression into unlawful imprisonment of conscience.

Recent events—including President Trump's August 25, 2025 Executive Action No. 14342 pressuring jurisdictions to reinstate "cash bail"—heighten the risk. The Plaintiff may face disproportionate pretrial detention, unable to satisfy even minimal bail due to cash-only restrictions.

Such enforcement would mirror the unconstitutional punishment of “status or condition” condemned in *Robinson v. California*, while also burdening the Plaintiff’s religious exercise under RFRA and the First Amendment.

The Plaintiff acknowledges that there are numerous statutes—at least a dozen—that could be stretched beyond breaking by an aggressive or politically motivated prosecution to manufacture and concoct probable cause against perceived rivals or dissenters. Under the current Trump/Bondi Department of Justice, these provisions could be invoked unreasonably or manipulatively to target the Plaintiff’s lawful political or religious activity and legal activism on any of the following statutes:

**Charges I could plausibly face someday, in order of decreasing likelihood, when working under RFRA to readjust/relitigate laws and policies**

Description	Statute	Probable cause	
Mutilation of national bank obligations	18 USC §333	Not yet, no	<a href="https://uscode.house.gov">https://uscode.house.gov</a>
Florida, etc. Two Party Recording Consent Laws	Florida Statutes	Not yet, no	<a href="http://www.leg.state.fl.us">http://www.leg.state.fl.us</a>
Paying altruistic organ donor for organ donation	42 USC §274e	Not yet, no	<a href="https://www.law.cornell.edu">https://www.law.cornell.edu</a>
Miami-Dade, etc. Anti-Cashless Business Ordinance	Miami-Dade Ord	Not yet, no	<a href="https://library.municode.com">https://library.municode.com</a>
Threats and extortion against foreign officials, official guests, or internationally protected p	18 USC §878	Not yet, no	<a href="https://www.law.cornell.edu">https://www.law.cornell.edu</a>
Threats against President and successors to the Presidency	18 USC §871	Not yet, no	<a href="https://www.law.cornell.edu">https://www.law.cornell.edu</a>
Conspiracy for threatened institution and enforcement of 122.5yo Calment max age limit	18 USC §1111	Not yet, no	
Self-defense water or pepper spraying an assaulting/battering police officer	Florida Statutes	Not yet, no	<a href="http://www.leg.state.fl.us">http://www.leg.state.fl.us</a>
Overwhelming religious need or religious question property boundary crossing	Various	Not yet, no	
Conspiring to convey birth control or abortifacients through federal mail	18 USC §1461	Not yet, no	
Pepper spray federal corporal punishment for stata, county, local officers injuring or killing	18 USC §115	Not yet, no	
Nationalized death with dignity, conspiring for physician assisted suicide	Public Law 105-	Not yet, no	

The Plaintiff sponsors and promotes braver arguments than most. While most of his focus is on preserving and extending quality life years, some of his beliefs touch on the freedom, responsibility, and duty to die, for instance, when a person grows too murderous or murderously-negligent for the nation they lead or nations they interfere with, or when a person tries to exceed or escape a maximum agreed-on national or international age limit (proposed to be set at 122.5 years old, the oldest-ever verified age so far achieved by Jeanne Calment), or as a matter of freedom when life becomes

1 excruciatingly painful and intolerable with death assisted by a physician or advanced  
2 practice nurse after careful ethics review.  
3

4 Please don't forget that a political campaign for the Commander-in-Chief and Presidency  
5 role is an open conspiracy toward the legitimate attainment of a monopoly on the entire  
6 range of coercive harmless, harm less, and harmful non-lethal, less-lethal, and lethal  
7 force, per Max Weber:  
8

9 "A compulsory political organization with continuous operations will be called a  
10 'state' [if and] insofar as its administrative staff successfully upholds a claim to the  
11 *monopoly of the legitimate use of physical force (das Monopol legitimen*  
12 *physischen Zwanges)* in the enforcement of its order."  
13  
14

15 In seeking to attain this monopoly on legitimate force and violence, with the goal of using  
16 it more harmlessly than its ever been used before, the Plaintiff may be arrested on  
17 supremely weak grounds just for sponsoring and advocating these initiatives. In  
18 Plaintiff's experience, the political forces controlling police forces are not always looking  
19 out first and foremost for the free expression of uncomfortable civil and religious  
20 expression and rights that run contrary to their views and interests; the privileges and  
21 comfort of incredibly powerful institutions enforcing the *status quo* often control and  
22 suppress original systems thinkers who resistantly demand that institutions change and  
23 adapt.  
24

25 I am seeking Congressional, Executive, and Court preauthorization, or a controlling part  
26 thereof, for all these actions listed above.  
27  
28

1 The US DOJ is seeking the death penalty for Luigi Mangione, who is alleged to have  
2 killed UnitedHealthCare CEO Brian Thompson in an act of assassination that the DOJ is  
3 working to prove as political terrorism. I don't condone Luigi Mangione's actions, as  
4 alleged. But unlike the DOJ, if I were in charge of the Executive Branch, I would  
5 commute Mangione's sentence with pardon powers and establish restrictive release  
6 conditions, instructing him that the only person he could point a gun or poison at, or  
7 harm in any way, would be myself if I held the position of President of the United States.  
8 If he committed the crimes that prosecutors allege, I would give him freedom of the  
9 White House grounds, I would meet with him biweekly to discuss public health priorities,  
10 and I would give him access to my pill dispenser; if he felt that I or the staff that I  
11 controlled were persistently denying Americans care to such a level that meaningful  
12 μHitlers of Americans were dying unnecessarily from my negligence or dereliction of  
13 duty, he would be free to exercise force against me through any nonlethal or lethal  
14 means, and he would have a full advance pardon for the same. I would prefer Mangione  
15 released to serve in the role of the officially appointed United States Presidential  
16 Assassin, with his target restricted just to me, with the heavy responsibility of operating a  
17 Damocletian Sword to keep me heads down and on-task in lifesaving Lifesaver Labs  
18 *Lifesavers Army* duty. That's my vision of how to convert this murderous tragedy of Brian  
19 Thompson into a legitimate, hopefully ongoing tradition in the White House of being  
20 subject to lethal, scientifically-grounded pressure to perform the deadly job of US  
21 President as harmlessly and with as much harm reduction as a human can. If he  
22 committed the crime he committed for the reasons he did, there is no one in the United  
23 States who would be a better "nucleating site" for the internal *Journals of Assassination I*

1 envision. Pointedly, I am not threatening President Donald Trump with this (he's  
2 grandfathered into the existing system of *Overprotected Kings, Vulnerable Pawns*), or  
3 any other Presidential Candidates running, unless they voluntarily wish to come under  
4 the same pressure. I would be the only person first in the hot seat. This is something,  
5 however, that if I attain any significant and influential share of Presidential power in a  
6 Team Precedency I hope to institutionalize for future generations of stateswomen and  
7 statesmen rising to serve in the most dangerous office in the United States, and spread  
8 this pattern eventually globally over time once we build working conventions and  
9 scientific experience and models with this, supporting and sponsoring well-regulated,  
10 legislatively-supported assassination pressure on all national leaders, who are all in  
11 inherently deadly positions, worldwide for the sake of harmlessness. I don't trust the  
12 persons who occupy the Presidency to stay focused on saving life carefully without this,  
13 especially if they otherwise enjoy near-complete totalitarian legal immunity for their  
14 actions in Office, per the Supreme Court in *Trump v United States*, 603 U.S. \_\_\_\_ (2024).  
15 As a Jew, I have an obligation to press as hard as I legally can for this, not just to  
16 prevent mini-Holocausts against my own American people, Jewish people, Israeli  
17 people, or European people<sup>12</sup>, but against any people anywhere in the world facing  
18 mini-genocides, easily avoidable health catastrophes, Mao *Great Leap Forward*  
19 mini-famines, and the like, per the rules and algorithmic statistical models established in  
20 Congress and with the help of technical and scientific expertise on harm reduction and  
21 prevention domestically and internationally.  
22  
23 I understand President Trump is pursuing the *Nobel Peace Prize*. I believe this system of  
24 well-regulated assassination on a scientific, trustworthy, open model of moral math on  
25  
26  
27  
28

<sup>12</sup> I am a triple citizen of the United States of America, Israel, and Portugal.

1 the  $\mu$ Hitler,  $\mu$ Mao, and  $\mu$ Stalin "Moral Harm Index" scales would be a fountainhead for  
2 and also head-off the need for many *Nobel Peace Prizes* in the future, if implemented  
3 ethically and reliably without prejudicial biases, preventing atrocities and reducing  
4 systematic violence.  
5

6 I appreciate that these views I have are perceived by those in control of Executive  
7 Power worldwide as "dangerous and threatening ideas". I wouldn't be surprised if  
8 someday I get suddenly mysteriously poisoned by someone in the employ of someone  
9 like the genocidal mass-murderer Vladimir Putin, who would be terrified of me  
10 succeeding in spreading such patterns of well-regulated assassins under strict moral  
11 math here, and then to the Russian Federation and Ukraine. If I were asked, I would  
12 explain that I want to send nuclear weapons immediately to Ukraine, as we're in breach  
13 of the Budapest Memorandum and need to make amends by restoring Ukraine's nuclear  
14 defensive weapons or send Americans to war in Ukraine's defense as we promised.  
15 Speaking like this while campaigning for the Presidency is going to turn me into a Putin  
16 target. But I can't be afraid. The Plaintiff David needs to, in seeking the Presidency, take  
17 on and even threaten some Goliaths. I am hoping that this Court and others like this  
18 Court will protect me from overzealous prosecution while campaigning freely and  
19 planning ahead to take Presidential power under a Team Precedency. But I do not know  
20 whether the DOJ under Pam Bondi will respect my rights to core political speech as this  
21 hopefully rapidly growing conspiracy to better monopolize State force continues.  
22

23 As such, given that the Plaintiff holds these unorthodox beliefs and wishes to build  
24 political movements around them, and given the current vexatious posture of  
25 prosecution that the DOJ holds under Donald Trump, the chief law enforcement officer  
26  
27  
28

1 and a still-unlabelled-as-such vexatious litigant, the Plaintiff would frankly be very  
2 surprised if he reaches his deathbed without being arrested unreasonably again for  
3 some kind of warped charge related to a speech, thought, or conspiracy crime, or some  
4 minor boundary crossing like making "a harangue or oration" to the Supreme Court (40  
5 U.S.C. § 6134) that should be resolved with a civil rather than a criminal process. And  
6 under this existing cash bail system, his liberty if Trump's DOJ presses charges to  
7 sideline unorthodox political co-optation could be forfeit for extremely long periods of time  
8 solely because of his religious belief that prevents him from tendering current cash legal  
9 tender to any part of the Government, because the Government will destroy, shred, and  
10 soil the Name of G-d on which Plaintiff's faith rests.  
11

12  
13 I don't want to turn into a *Navalny* figure, getting arrested repeatedly by the DOJ running  
14 something similar to Putin's political suppression playbook for me fighting for what I  
15 religiously believe. I just want to get back to concentrated app development as quickly  
16 as I can, to try to prevent sexual assault with ro (e.g. zero) to one technology, spending  
17 only a small part of my time working on the Team Presidency groundwork in the next  
18 year or two until the *Lifesaver Labs Public Benefit Corporation* I lead is more stable,  
19 successful, and self-sustaining.  
20

21  
22 I have every reason to believe that my parents, who still effectively head my family  
23 network, would not bail me out if I'm arrested for expressing these views. My siblings  
24 would not either, deferring to my parents, and it's very likely my closest friends will defer  
25 also to my siblings and parents. If I'm arrested in Palm Beach County, where I live, or  
26 thousands of other counties in the US I might be if Trump's DOJ sends officers to my  
27  
28

1 door, credit cards are not accepted toward bail payments and I could be stuck in jail for  
2 months if no religious accommodation is made for CashAlt payment methods.  
3

4 It is on that basis that I plead with the Court to get involved in this matter preventatively  
5 and order Congress and the Executive at every level of Government to accept CashAlt  
6 bail payment to prevent my and other cashless Americans' undue entrapment or  
7 extended imprisonment for any of these reasons above that I or they may be unfairly  
8 accused of in early campaigning, advocacy, and campaign calmunity (community)  
9 growth, and issue Court orders starting the long transition away from sacred  
10 unhyphenated *In G-d We Trust* cash toward better, much more compelling and civically  
11 but not divinely overly-sacred designs.  
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**APPENDIX G: EXECUTIVE ORDER 14342 "TAKING STEPS TO END  
CASHLESS BAIL TO PROTECT AMERICANS"**

**APPENDIX H: EXECUTIVE ORDER 14340 "MEASURES TO END CASHLESS  
BAIL AND ENFORCE THE LAW IN THE DISTRICT OF COLUMBIA"**

**APPENDIX I: RELIGIOUS ACCOMMODATION RE MIAMI-DADE CASHLESS  
BUSINESS ORDINANCE (EMAIL)**

**APPENDIX J: BYLAWS OF DAVID CLAYMAN OF LIFESAVER LABS FOR  
PRECEDENT & PRESIDENT (Specifically the *In G-d We Trust* Cash Use  
Prohibition on Page 6, Point #6)**

## Presidential Documents

Executive Order 14342 of August 25, 2025

### Taking Steps To End Cashless Bail To Protect Americans

By the authority vested in me as President by the Constitution and the laws of the United States of America, it is hereby ordered:

**Section 1. *Purpose and Policy.*** Maintaining order and public safety requires incarcerating individuals whose pending criminal charges or criminal history demonstrate a clear ongoing risk to society. When these individuals are released without bail under city or State policies, they are permitted—even encouraged—to further endanger law-abiding, hard-working Americans because they know our laws will not be enforced. Our great law enforcement officers risk their lives to arrest potentially violent criminals, only to be forced to arrest the same individuals, sometimes for the same crimes, while they await trial on the previous charges. This is a waste of public resources and a threat to public safety.

As President, I will require commonsense policies that protect Americans' safety and well-being by incarcerating individuals who are known threats. It is therefore the policy of my Administration that Federal policies and resources should not be used to support jurisdictions with cashless bail policies, to the maximum extent permitted by law.

**Sec. 2. *Consequences for Cashless Bail Jurisdictions.*** (a) Within 30 days of the date of this order, the Attorney General shall submit to the President, through the Assistant to the President for Homeland Security, a list of States and local jurisdictions that have, in the Attorney General's opinion, substantially eliminated cash bail as a potential condition of pretrial release from custody for crimes that pose a clear threat to public safety and order, including offenses involving violent, sexual, or indecent acts, or burglary, looting, or vandalism. The Attorney General shall update this list as necessary.

(b) The head of each executive department and agency, in coordination with the Director of the Office of Management and Budget, shall identify Federal funds, including grants and contracts, currently provided to cashless bail jurisdictions identified pursuant to subsection (a) of this section that may be suspended or terminated, as appropriate and consistent with applicable law.

**Sec. 3. *General Provisions.*** (a) Nothing in this order shall be construed to impair or otherwise affect:

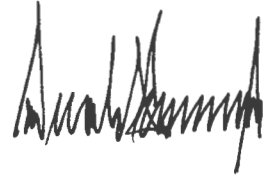
(i) the authority granted by law to an executive department or agency, or the head thereof; or

(ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.

(b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

(d) The costs for publication of this order shall be borne by the Department of Justice.

A handwritten signature in black ink, appearing to be "Donald Trump", located in the upper right quadrant of the page.

THE WHITE HOUSE,  
*August 25, 2025.*

## Presidential Documents

Executive Order 14340 of August 25, 2025

### Measures To End Cashless Bail and Enforce the Law in the District of Columbia

By the authority vested in me as President by the Constitution and the laws of the United States of America, it is hereby ordered:

**Section 1. *Purpose and Policy.*** As stated in Executive Order 14333 of August 11, 2025 (Declaring a Crime Emergency in the District of Columbia), there is a crime emergency in Washington, D.C., that is impeding the operations and responsibilities of the Federal Government. The District of Columbia government's pretrial release policies, which include prohibiting cash bail, contribute to the disgraceful conditions referenced in the aforementioned Executive Order, as law enforcement must arrest the same individuals multiple times, and dangerous criminals are sometimes rapidly released. This leaves such criminals free to endanger American citizens visiting our Nation's capital, Federal workers discharging their duties to our Nation, and citizens of the District of Columbia trying to live their lives safely. It is therefore the policy of my Administration that all necessary and lawful measures be taken to end cashless bail policies and ensure the pretrial detention of any criminal suspect who threatens public safety.

**Sec. 2. *Ending Unwarranted Pretrial Release in the District of Columbia.*** (a) To prevent the release of dangerous suspects based on cashless bail policies, relevant Federal law enforcement agencies and officials who are members of the D.C. Safe and Beautiful Task Force established in Executive Order 14252 of March 27, 2025 (Making the District of Columbia Safe and Beautiful), shall work to ensure that arrestees in the District of Columbia are held in Federal custody to the fullest extent permissible under applicable law, and shall pursue Federal charges and pretrial detention for such arrestees whenever possible, consistent with applicable law, to ensure that criminal defendants who pose a threat to public safety are not released from custody prior to trial.

(b) Further, the Attorney General shall review the Metropolitan Police Department (MPD) General Orders and other policies and practices of the MPD to identify those that may result in pretrial release of criminal defendants who pose a threat to public safety and, consistent with section 740 of the District of Columbia Self-Government and Governmental Reorganization Act (Public Law 93-198), shall request that the Mayor of the District of Columbia make such updates and modifications to such orders and policies as the Attorney General determines would be necessary to address the crime emergency and help to ensure public order and safety.

**Sec. 3. *Measures to End Cashless Bail in the District of Columbia.*** (a) The Attorney General shall determine whether the District of Columbia continues to maintain a policy or practice of prohibiting cash bail as a potential condition of pretrial release from jail for crimes prosecuted under the Code of the District of Columbia in the Superior Court of the District of Columbia where the arrestee poses a clear threat to public safety and order. Such cases include violent or sexual offenses such as rape, murder, carjacking, and assault, as well as property offenses such as burglary, looting, and vandalism. The Attorney General shall update her determination if the District of Columbia changes its cashless bail policies or practices.

(b) If the Attorney General determines that the District of Columbia continues to maintain a policy or practice of prohibiting cash bail, the head of each executive department or agency (agency), in coordination with the

Director of the Office of Management and Budget, shall identify appropriate actions to press the District of Columbia to change its policies with respect to cashless bail. Such actions may include Federal funding decisions or the provision of Federal services or approvals by agency heads, as well as actions the Attorney General identifies as necessary and appropriate because of the emergency conditions based upon which section 740 of the District of Columbia Home Rule Act has been invoked. The head of each agency shall undertake any such actions he or she deems appropriate, consistent with applicable law.

**Sec. 4. General Provisions.** (a) Nothing in this order shall be construed to impair or otherwise affect:


(i) the authority granted by law to an executive department or agency, or the head thereof; or

(ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.

(b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

(d) The costs for publication of this order shall be borne by the Department of Justice.

A handwritten signature in black ink, appearing to be "Donald Trump", is located on the right side of the page.

THE WHITE HOUSE.  
August 25, 2025.



David Clayman <david@clayman.org>

## Religious Accommodation RE: Cashless Business Ordinance

David Clayman <david@clayman.org>  
To: consumer@miamidade.gov

Sun, Aug 17, 2025 at 11:41 PM

Dear Miami-Dade Consumer Protection Division,

I'm writing you because my religious beliefs may put me in sharp conflict with Cashless Business Prohibition Ordinances like the one that passed in Miami-Dade a few years ago.

I'm not able to use or afford accepting United States cash as a means of payment because of my strand of Jewish religious beliefs, which prohibit me from recirculating or depositing US currency, which has the sacred unhyphenated name of G-d written on it (in "In G-d We Trust"). I can't deposit or recirculate as part of the chain-of-custody because banks 15% of the time shred the Name of G-d and do so without even the slightest religious ceremony or religious burial, and cash with the sacred name of G-d on it gets walked into bathrooms all the time where the fully-printed Name of G-d should never be.

I'm suing the federal government to get the motto changed to something more reasonable I can circulate and deposit someday for non-lifesaving, ordinary economic purposes, which you can read about at [InGWeTrust.org](https://InGWeTrust.org). Of all the documents there, I'd recommend you focus on [the First Amended Complaint](#), which spells out my RFRA, 1st Amendment, and 5th Amendment arguments.

In the meantime, until US currency no longer has the name of G-d printed on it, may I have a religious exception and religious accommodation to the [Cashless Business Prohibition Ordinance Policy](#)? If someone gives me cash as payment, the only thing I can religiously do with it is hold onto it indefinitely or donate it to a lifesaving charity, and that's not sustainable as a business -- I don't think I can donate every cent of cash-based revenue to lifesaving charity, be obliged to always accept cash whenever offered, and survive. Wouldn't you agree that it's not feasible to compel me or any other Jews like me to pay \$1,000 per incident in which I insist on payment in some alternative to cash?

I just won't be able to start a retail business anywhere in Miami-Dade ever until there's an exception and religious accommodation under [Florida RFRA](#). Otherwise, I'd basically be subject to a \$1,000 Governmental Taking every time I try to sell, say, a \$20 T-shirt at retail cashlessly and a cash-reliant Miami-Dade customer chooses to complain or your Office proactively polices and aggressively enforces. At present, until there's an explicit written reliable religious accommodation, starting a business in Miami-Dade County with unexempted, unexcepted revenue streams is economically and religiously impossible and a non-starter.

Please let me know, and please let me know if you'll make the same accommodation for anyone else who pleads for a similar religious accommodation to better protect the Name of G-d on cash currency (from superfluous exposure and shredding, bathrooms, etc.)

Please I would appreciate it if you would write me back with a response no later than Wednesday, August 20th, within three business days. I have a hearing on Thursday, August 21st, and your answer to this religious accommodation request will be important to integrate into the discussion we have on the complications and burdens that IGWT cash causes me and anyone else who may follow similar practices.

All the best,  
David Clayman

## **Bylaws of *David Clayman of Lifesaver Labs for Precedent & President***

*Formerly, Still Requiring FEC Name Change: David Clayman of Harmless Hands for President & Precedent*

*Principal Campaign Committee for David Clayman*

*Adopted on April 24, 2025*

*Last Modified on August 30, 2025*

### **Article I. Name and Purpose**

1. **Name:** The name of this committee shall be *David Clayman of Lifesaver Labs for Precedent & President*. [Endnote 1]

#### **Purpose:**

This committee is organized to elect David Clayman—or, in keeping with the *Humble Hands* ethos, ideally an even better candidate who may prove more effective and innovative at advancing humble and centripetal Executive branch harmlessness—to serve as a stabilizing force at the head of the federal Executive. The candidate will share responsibility for team-based governance and coordinated leadership, carrying forward the torque, force, acceleration, and momentum of the movement for approximately two years, from January 20, 2029 to January 20, 2031. At that point, or sooner if objectives are met, the officeholder will resign in favor of a successor chosen through the midterm process.

The committee exists to support this mission through fundraising, outreach, and public advocacy consistent with federal election law and the values of the Lifesaver Labs *Harmless Humble Hands* movement.

#### **Offices Served:**

- **Precedent of the United States** (modeling Precedential Referendum leadership),
- **President of the United States**,
- **Commander-in-Chief of the United States Armed Forces**.

#### **Succession Plan:**

- The Team Precedency and Vice Precedency shall resign no later than January 20, 2031, yielding to the Speaker of the House of Representatives from any established political party that secures a midterm majority.
- Upon resignation, the Speaker will immediately assume the Oath of Office as Vice President, then as President, and serve from no later than noon on January 20, 2031 until the next full-term Inauguration at noon on January 20, 2033.
- Should the Team Precedency achieve its objectives earlier than anticipated, this resignation and transition may occur sooner.

#### **Structure of the Team Precedency:**

- The Team Precedency will function as a civic religious *Trinity* composed of representatives from the center, the right, and the left. Members will share power equally, except in times of emergency when a quorum can not be effectively called, and except in matters that are critical to American democracy and transcend right, left, center politics like suffrage rules, Executive support for statehood admissions, a federal end to partisan gerrymandering at every level of government, strict balanced budget rules and amendment, and the like.
- Unless there are dramatic sudden changes in American eligible voter party affiliation, the right will ordinarily be represented by the current Republican nominee, and the left by the current Democratic nominee, subject to replacement at any time under the right party's and left party's internal rules. At maturity, if the primary party affiliated with the right, left, and center change, the party nominee elevated into the Team Precedency sponsored by *Lifesaver Labs* will change accordingly.
- The *Centripetal Center Candidate* will serve as the unifying anchor and will be formally registered as President of the United States and Commander-in-Chief.
- The *Cincinnatus Center* candidate will serve in the Team Presidency no longer than two years, resigning by January 20th following the midterm elections. Although the Center cannot be replaced under law or party rules once elected and confirmed, it is a civic and moral duty for her to actively identify and elevate stronger centripetal successors prior to election finalization. With so much life and liberty at stake, the centripetal anchor must not cling to nomination or office out of pride when better-suited alternatives emerge.

In recognition of the vast scope and inherent harms of the overly tremendously powerful and dangerous Chief Executive role, the *Lifesaver Labs Harmless Humble Hands* framework asserts that no individual can be fully confident of being the most harmless steward of such power. Therefore, continual humility, rapid succession, and better "booster rocket" renewal are core obligations of the Precedency and Presidency to prevent needless death and maximally

promote and preserve human life within the sphere of influence and control of the United States, as all candidates in the Team Precedency will be religiously compelled to do.

2. This committee shall endeavor to make the Precedential and Presidential race much more open and competitive, filing legal cases as needed to lower the cost of entry and the administrative burden of founding a political party, achieving fair and equitable ballot registration and access, and achieving electoral choice reforms that support stable and steady or flash third-party growth as proven in other regions like ranked-choice voting and multimember electoral districts that defy the duopolistic *Duverger's Law*.
3. This committee shall make an effort to participate in and attain for the Candidate or his better replacement the Presidential and Precedential nomination of any party that is civically religious, achieves widespread ballot access, and can be joined to this movement for a service term focused on centripetal life and death questions and constitutional reform fundamentals, including: the *Forward Party*, the *Democratic Party*, the *Republican Party*, the *Libertarian Party*, the *Green Party*, and the *Alliance Party*. The Candidate and the Committee are each authorized to take legal action as needed to ensure that the pathway for such free association and mutual multiparty universal endorsement is not blocked by anti-competitive internal or external rule-making like exclusivity requirements, and that the rules for attaining the endorsement and nomination of any or all of these Parties are fair and equitable to third-party candidates.
4. The Candidate and the Committee are each authorized to bring legal claims to Court to make universal United States and US Territory recognition and ballot access of nascent or growing third parties like *Lifesaver Labs* much more cost-effective, efficient, and feasible in federal elections, to the point where a single mostly-unassisted individual can feasibly, plausibly, and affordably within the limits of individual space, time, and energy over two or three years working part-time start a national party, register as a federal candidate for Precedent or President or Vice-Precedent or Vice-President, achieve ballot access, and, if so graced, win the support of the public for a Precedential or Vice-Precedential Platform on the merits.
5. It is the express Purpose of the Committee to set a remarkable national record for cost-efficiency and accessibility in the seeking of Precedential or Vice-Precedential Office, setting a standard for ethics in office-seeking that makes the a maximum contribution to the Precedency or Presidency and a Precedential and/or Presidential run accessible to even those living at or below the Federal Poverty Line. That shall include setting and sticking to a maximum donor donation limit for this Candidate, this Committee, and this Campaign that is affordable and accessible to youth with allowances or part-time jobs aged 13 - 17 and most of those living at and below the Federal Poverty Line, and relying on matching federal funds and the Presidential Campaign Fund.

6. This Committee is authorized to make any legal or policy claims necessary to enable fair and equitable treatment by the Federal Election Commission, Congress, existing or nascent cooperative and/or competitive political parties, and any other regulatory or other body/bodies that can advance or waylay the mission of this Committee.
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## **Article II. Offices**

1. **Principal Office:** The principal office of the committee shall be initially located at 7930 Palacio Del Mar Drive, Boca Raton, FL 33433-4148.
  2. **Other Offices:** Additional offices may be established as needed by the Candidate or Treasurer.
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## **Article III. Officers and Duties**

### **1. Candidate (David Clayman)**

- Authorizes the formation and direction of the committee.
- May appoint or remove officers.
- May approve or veto expenditures and strategic campaign decisions.

### **2. Treasurer**

- Must be designated on FEC filings.
- Maintains complete and accurate records of all contributions and expenditures.
- Files all reports required by the Federal Election Commission (FEC).
- Manages the committee's official bank account and financial activity.

### **3. Campaign Manager (Optional)**

- May be appointed to oversee day-to-day campaign operations, personnel, messaging, and scheduling.

### **4. Additional Officers**

- The Candidate may appoint additional officers (e.g., Compliance Officer, Secretary, Technology Director), defining their roles at the time of appointment.

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## **Article IV. Governance and Meetings**

1. **Meetings:** The committee shall meet at the discretion of the Candidate or Treasurer.
2. **Quorum:** A quorum consists of the Candidate and Treasurer.
3. **Decision-Making:**
  - Strategic decisions require the Candidate's approval.
  - Financial decisions require the Treasurer's authorization and must comply with applicable laws.
  - If other officers are appointed, the Candidate may establish advisory voting procedures.

### **4. May Be Represented Pro Se in Any Legal Action by the Candidate**

- It is the position of this Principal Campaign Committee that Court decisions like *Rowland v. California Men's Colony*, 506 U.S. 194 (1993) and *Pridgen v. Andresen*, 113 F.3d 391 (2d Cir. 1997) place an undue substantial burden on religious expression by the Committee and the Candidate in attempting to force the Committee and the Candidate into expensive and dependent representation by a licensed attorney instead of allowing the Committee to prosecute legal cases with and through the Candidate advocating and representing the Committee as a Pro se with the helpful modern assistance of Large Language Models and Artificial Intelligence. The position of this Committee is that this forced reliance on the bar association, both before and especially after the advent of powerful Large Language Model Artificial Intelligence assistance, is a substantial religious burden in gross violation of the *Religious Freedom and Restoration Act* (42 U.S.C. § 2000bb), and this Principal Campaign Committee, whether unincorporated or incorporated, shall instead rely periodically and as needed on the Candidate to bring cases on the Committee's behalf.

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## **Article V. Financial and Legal Compliance**

1. **Bank Account:** The committee shall maintain a separate bank account solely for campaign-related financial activity.
2. **Contributions and Deposits:**

- All contributions and deposits must comply with FEC and campaign finance laws.

3. **Expenditures:**

- No expenditures may be made without the knowledge of the Treasurer.
- All disbursements must comply with FEC and campaign finance laws.

4. **Recordkeeping:** The committee shall maintain all financial records, donation records, and FEC filings for no less than 3 years after the campaign concludes.

5. **Transparency:** Financial activity and decision-making records shall be available for internal review by officers.

6. ***In G-d We Trust* Cash Use Prohibition:** In keeping with the Candidate's religious beliefs, this Committee shall never allow or engage in a cash transaction of any kind involving transfer of unabbreviated, unhyphenated *In G-d We Trust* currency (banknotes or coins) unless either

- (a) the counterparty is a currency collector committed to forever protecting the cash so transacted from destruction,
- (b) the matter rises to the level of being a life and death necessity, and no other alternative exists, or
- (c) an enforceable, verifiable legal agreement and process exists between the Department of Treasury, the Federal Reserve, the depositing bank, the Committee, and the Candidate to ensure that the National Motto, which is too sacred currently under Candidate's religious beliefs, is not shredded or otherwise recklessly destroyed when deposited even if deemed by currency evaluation and destruction equipment at time of deposit as unfit for circulation.

Any sacred unabbreviated, unhyphenated *In G-d We Trust* cash that may accidentally come into the possession of the Committee must be protected as a sacred object that can not be transferred to or deposited in a bank except under condition (a) and (b) above. If and when the currency system is thoroughly reformed to not employ and destroy any name or phrase that the Candidate considers too sacred to be used on currency and secular documents, the Committee can then use and accept United States cash again. Until then, the Committee must not process cash unless it meets condition (a) or (b) above.

In the meantime, this Committee shall operate on an entirely cashless basis in any transaction denominated in US currency, even if it impedes our ability to accept and deposit donations or perform disbursements efficiently.

This Committee is authorized to join legal action by the Candidate to reform US currency to help relieve itself of this restriction.

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## Article VI. Amendments

1. These bylaws may be amended by written agreement of the Candidate and Treasurer. Any amendments shall be signed and dated, and a copy shall be retained with committee records.

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## Article VII. Dissolution

Upon dissolution of the committee, the Treasurer shall:

1. Pay all outstanding debts and obligations.
2. Distribute any surplus funds in accordance with FEC regulations.
3. File all final FEC reports and formally terminate the committee with the Commission.

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## Endnotes

Endnote 1: The more preferred name of the committee would be *Lifesaver Labs Nobody Team Precedency and Presidency*, with a footnote gratefully noting and disclosing AI model and technological assistance and symbiosis, but the FEC naming rules currently require the identification of a single human Presidential candidate to headline and source-identify the principal campaign committee. The self-effacing humility of Emily Dickenson's *Nobody* isn't accepted under current political rules.

I'm Nobody! Who are you?  
Are you – Nobody – too?  
Then there's a pair of us!  
Don't tell! they'd advertise – you know!  
How dreary – to be – Somebody!  
How public – like a Frog –  
To tell one's name – the livelong June –  
To an admiring Bog!

## Signatures

Signed and adopted by: David Morris Clayman 2025-09-01

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**David Clayman, Candidate**

Signature: *David Morris Clayman*

Date: 2025-09-01

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**David Clayman, Treasurer**

Signature: *David Morris Clayman*

Date: 2025-09-01

## APPENDIX K: PROPOSAL FOR COMPLETE U.S. CURRENCY REDESIGN TO BETTER MEET COMPELLING GOVERNMENT INTERESTS

### Currency Name Change Contest to Celebrate the U.S. 250th Anniversary

The United States will commemorate its 250th anniversary on July 4th, 2026, just little more than a year from now. As part of this celebration, the government ought to take this opportunity to engage citizens in a meaningful and inclusive contest to propose new, more morally and linguistically resonant names and beautiful graphic designs for U.S. currency. We can do a lot better than the currency we currently have if we unleash our nation's creativity on the problem.

This initiative would:

1. **Promote Civic Engagement:** By inviting public participation, the contest would foster national unity and pride.
2. **Honor Diversity:** Designs could reflect the cultural and historical richness of the United States.
3. **Modernize Currency Aesthetics:** Updated designs could incorporate state-of-the-art security features while celebrating the nation's heritage.

The Plaintiff would propose a nationwide and international "currency renaming contest" to find a better name title for the US dollar, one that's educational, aspirational, and transactionally resonant. The Plaintiff would propose three different names as "starter suggestions". The Plaintiff thought obsessively for several months about the question of what currency name would be better or best for the United States currency, and the three suggestions he settled on as most competitive ("the interactive currency names to beat") were the following:

1. CALM

2. QALM (pronounced "CALM", with implied easy access to state a QUALM)
3. TRUST
4. RIPPLES

I want to have the opportunity to explain to the Secretary of the Treasury the unbelievably strong merits of all four, and work with artists and designers to make the "deep culture" case for all three. But let me briefly give you one example of the "deep culture" titling design for CALM, just so you can have a sense of how a clever currency retitling could influence and be cross-reactive with our national culture and language in contexts that matter enormously.

CALM has immediate clear meaning; Merriam-Webster's dictionary defines calm as an adjective, verb, and noun, variously describing a condition in which one is in a "state of tranquillity", a state where one is "free from agitation, excitement, or disturbance". It can be used in combination with "down" to "make calm", with the example usage of "*calm* him down; get him to be reasonable" (S.H. Adams). Shouldn't our currency be imbued with the almost magical quality of being able to get people, peoples, and nations we deal with to be reasonable?

**C** (character - child - community - covenant - contract - change)

**A** (altering - assuring - associated - adjusting)

**L** (life - liberty - love)

**M** (moments/minutes/months/millenia - metrics - milestones - meaning - monuments)

I enclosed a set of backronymed meanings specific to organ donor incentives in another federal civil case I filed recently (*Clayman v United States*, Southern District of Florida, 0:25-cv-60447) that are exemplary of how beautifully multivalent CALM backronymed currency can be.

I also asked an LLM (ChatGPT 4o) to respond to the following prompt: "Can you list a large set of backronyms for CALM, assuming that CALM is our new currency name, and assuming that each of the backronyms should showcase our social and moral values and aims for the purpose of commercial exchange?" This is what it spit out immediately<sup>13</sup>, these not being my utmost favorite examples but exemplary of a range of meanings that people may diversely choose to cue themselves with when they transact with this currency and teach to their children and grandchildren to always, no matter what challenges life throws at them, "Keep CALM and Carry On":

**ChatGPT Response:**

Certainly. Below is a large set of **value-forward, purpose-driven backronyms** for **CALM**, assuming it's the name of a **reimagined national currency** designed to express moral, social, and commercial ideals.

◆ **Social & Moral Values**

**Human Flourishing & Justice**

- **Civic Access, Liberty & Mutuality**
- **Compassion, Accountability, Liberty & Merit**
- **Conscience, Altruism, Lawfulness & Moderation**
- **Civility And Lawful Markets**

<sup>13</sup> The structure of this case, as well as this immediate example of direct LLM use to assist in creativity, is an immediate example of the value of LLM access for those subject to the involuntary servitude and slavery exceptions of the 13th Amendment in jails and prisons across the United States and its territories.

- **Commonweal, Altruism, Liberty, Moderation**

## **Ethics & Trust**

- **Character And Legal Morality**
  - **Consent, Agency, Liberty & Mindfulness**
  - **Clear Agreements, Lawful Means**
  - **Conscientious Action & Legal Moderation**
  - **Covenant, Agreement, Loyalty, Meaning**
- 

## **Commercial & Economic Purpose**

### **Purpose of Trade / Exchange**

- **Commerce Aimed at Lasting Mutuality**
- **Currency Advancing Legitimate Markets**
- **Circulating Agreement for Legitimate Means**
- **Collaborative Allocation of Labor & Materials**
- **Crediting All Labor Meaningfully**

### **Antidote to Exploitation or Greed**

- **Counteracting Avarice, Lending Moderation**
- **Capitalism Aligned with Love & Morals**
- **Commerce Against Lust for Monopoly**
- **Curbed Avarice, Lifted Morals**

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 **Education, Enlightenment & Calm Thinking**

- **Clarity, Awareness, Logic & Mindfulness**
- **Civic Awareness & Lifelong Morality**
- **Curiosity About Life's Meaning**
- **Cultural Advancement through Learning & Moderation**
- **Critical Awareness, Love, & Moderation**

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 **Peacebuilding & Reconciliation**

- **Common Agreement, Lasting Mutuality**
- **Currency Advocating Love & Mercy**
- **Conflict Avoidance, Love Manifested**
- **Civic Agreements for Lasting Mediation**
- **Calm Allocation of Love & Means**

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 **Sustainability & Responsibility**

- **Conserving All Life Mindfully**
- **Circular Allocation of Limited Materials**
- **Caring About Land & Mankind**
- **Carbon-Aware Local Markets**

- **Commons And Land Management**
- 

## **Civic Orientation & Public Good**

- **Currency Advancing the Local Majority**
  - **Community Access, Lawful Markets**
  - **Commons Allocation for Liberty & Meaning**
  - **Citizen Agreements for a Lawful Marketplace**
  - **Civic Agreements & Legal Moderation**
- 

## **Philosophical, Spiritual & Reflective**

- **Consciousness And Loving Measure**
- **Calling All Lives Meaningful**
- **Centering Altruism, Logic & Meaning**
- **Channeled Altruism, Less Materialism**
- **Calling All to Light & Moderation**

Let me know if you'd like more or a specific theme! 🚀 "

Imagine, for example, a young child saying, "I want to earn a lot of calm (CALM) when I grow up", reinforcing the need to attain, achieve, and maintain emotional self-mastery lifelong as a key to lifelong success. Of the following three sentences, one is clearly the worst fit:

1 A) "When I grow up, I want to have CALM"

2 B) "When I grow up, I want to have Trust"

3 C) "When I grow up, I want to have Dollars"

4  
5 Most ordinary people would choose A and B as intrinsically goods obviously worthy of pursuit,  
6 not C. C is the odd one out and sticks out like a sore thumb. It's like saying, "When I grow up, I  
7 want to have tools". Ok, great, but what are you going to do with those tools? What exactly  
8 makes those tools worth having and sacrificing for? Tools and dollars are an extrinsic secondary  
9 operant conditioner; not an intrinsic or primary reinforcer and not a basic need, hunger, or  
10 aspiration as some of these other proposed associations are.

11  
12 Or a retiree saying, "I have enough calm to retire," relieved that they finally have enough of a  
13 nest egg to face any crises that may come with calm equanimity. Or a decamillionaire being able  
14 to say, "I paid 118,000 CALM for taxes this year. My net worth is at 10 million CALM. I love/hate  
15 CALM going to the Government over my philanthropic calmunity pursuits." Or a shop being able  
16 to say, "That dress is worth 155 calm." and a customer replying, "That's too much calm for this  
17 dress, I get nervous above 100." Or a Starbucks valuing (and pricing) all its products in calm, as  
18 an exchange of calm. Or an employee asking for a raise from C22.50 to C24 per hour ("I really  
19 need a raise from 22.50 CALM to 24 CALM per hour; I don't have enough calm from my raise  
20 this year to keep up with the rise in the cost of living") Or a homeless person in great need  
21 suffering tremendous hunger asking a stranger for a little calm. Or a religious preacher in the  
22 Judeochrislam tradition teaching her or his congregation of Isaiah 32:17, "The work of the  
23 righteous shall be calm and confidence forever." And for all these situations, each person in the  
24 transaction is not only pursuing an ongoing general feeling of calm in their life (even when  
25 paying for theme park / rollercoaster thrills and excitement), but is also possibly thinking of their  
26 own more specific contribution to the CALM, whether that be a teacher focused on  
27 Childhood-Altering Life Moments for the kids they teach or a police officer telling a driver they  
28

1 stop from speeding to "Stay calm, ma'am", with the subtext that the driver's calm comportment  
2 will make the security encounter go more smoothly and help prevent calm from being  
3 threatened, and legal fines and punishments denominated in or impacting the judge's  
4 interpretation of what's necessary to *Communally Adjust Liberty Modes* for the person who was  
5 so stopped.  
6

7 I used to have a special font where I created a unique, "mode aware" currency symbol for  
8 CALM. My proposal would be to denote CALM's currency symbol with a C with an optional  
9 checkmark positioned in the empty space in the middle of it, similar to the Quality Checkmark  
10 trademarked by the Joint Commission on Accreditation of Healthcare Organizations<sup>14</sup>, just with a  
11 C instead of a Q, and an animated dynamic with the checkmark being added dynamically  
12 instead of static if the customer or counterparty strongly approves of the transaction and its  
13 underlying ethics.  
14



25  
26  
27  
28  
<sup>14</sup> [https://tsdr.uspto.gov/#caseNumber=78693317&caseSearchType=US\\_APPLICATION&caseType=DEFAULT&searchType=statusSearch](https://tsdr.uspto.gov/#caseNumber=78693317&caseSearchType=US_APPLICATION&caseType=DEFAULT&searchType=statusSearch)



In the coming months, as this case moves forward, I'll try to find time to animate this CALM logo and the CALM backronym in a beautifully simple crossplatform smartphone application. I recently attained the skills to do so cross-platform with animations (animated position and animated opacity in scaffold stacks) using Flutter (<https://www.flutter.dev>). I suspect it will be the most cost-effective way to communicate this possibility of CALM currency graphically to a very, very, very large "calmunity".

I dream of a standard in commerce where at point-of-sale, a customer would have the option but not the obligation to tap the currency symbol to signal that they are happy and satisfied with the trans-action and its ethics, as a kind of miniature "thumbs up" checkmark quality survey for the seller or retailer, to signify enthusiastic consent or satisfaction. It would become like a little **"voting box" or "ballot box" for daily commerce**, democratizing commercial voting feedback and helping guide and motivate trans-actions that are more satisfying, fruitful, and CALM (in many manifold dimensions) for everyone involved. Imagine, for instance, retailers noticing that consumers aren't endorsing calm as frequently when they shop for eggs as egg prices spike due to spiraling inflation. Perhaps that ability to vote for or, more commonly, against retailer price increases at the bill of sale or even line item level can help moderate the causative factors and mood of inflation. I even dream that having such a dynamic "ballot box" currency could spread the principles of democratic capitalism and the peace and calm it brings (CALM UNism) to countries worldwide that operate on more dangerous dictatorial, communistic, or authoritarian models of governance. Many years ago while living in China I even created a special character

1 in a font I created just to type the two versions of this currency symbol I'm imagining. But sadly, I  
2 lost the file for that font when switching laptops some time ago, and I don't currently want to take  
3 the time to reconstitute it; the process of creating a specialized font is fussy and time-consuming.  
4 But I will make versions of that design readily usable on my keyboards before meeting in Court  
5 or in mediation with any representatives of the Department of Treasury or the Executive Branch,  
6 so that I can explain this expansion of "voting rights" to commerce, a realm where we already  
7 vote but more passively than this currency symbol enables on the services and goods that make  
8 up our world far more frequently than at the ballot box. From my point of view, a currency symbol  
9 that helped enable "voting" on your commercial transactions would be the coolest currency  
10 symbol on Earth, and might even gently encourage the spread of political democracy and the  
11 electoral ballot box through the experience of commercial "democratic voting" in ballotboxed  
12 commerce.  
13

14 To make a brief case for CALM, if the currency were retitled by Congress, Courts, or Executive  
15 from Dollar to CALM, any person could freely express what earning or saving 100 CALM most  
16 means to them, and pursue that, all while remaining permanently aligned on the community  
17 altar-ing life model and organizing principle of interpersonal, domestic, and international calm.  
18

19 *The Brief Case for QALM*  
20

21 QALM is a much more acronymically constrained alternative to CALM that is meant to be  
22 pronounced the same as CALM and would generally stand for **Quality Adjusted Life Moment,**  
23 **Minute, Month,** and closely matches the **QALY** public health unit (Quality Adjusted Life Year).  
24 The nice thing about QALM is that its spelling is very close to *QUALM*, and when using QALM  
25 the right to bring up a QUALM about your transaction would always be within reach. QALM, like  
26 CALM, can benefit from a checkmark-based dynamic voting currency symbol.  
27  
28

*The Brief Case for Trust*

The concept of Trust is already embedded in the National Motto, and promoting Trust from a word hidden in the national motto to the name of our national currency would make the concept of Trust far more prevalent in our exchanges. Trust is an intrinsic good, wherein holding or attaining more Trust is always implied to be a morally meaningful goal. As Justin Broglie pointed out many years ago, currency exchange is basically an objective measure of mutual Trust in the performance of goods and services that we trade with each other. Quoting a cost in Trust allows the buyer to evaluate whether they do trust the seller enough with their Trust, and if the exchange goes poorly, the buyer can rightly point out, "I Trusted you. Please make good on your promises or refund my trust immediately." Unlike CALM or QALM, the Plaintiff hasn't thought of a groundbreaking dynamic currency symbol for Trust.

**Switch to Durable Plastic, Variably Sized Currency**

The United States should adopt plastic currency, as many countries (e.g., Australia, Canada, and the UK) have already done. Benefits include:

1. **Durability:** Plastic banknotes last significantly longer than paper notes, reducing production and recycling costs over time. This is especially important for any currency that is intended to be durably sacred with any remaining version of G-d's Name in non-sacred form.

2. **Environmental Impact:** Fewer replacements mean less waste and resource consumption.

3. **Enhanced Security:** Plastic notes can incorporate advanced anti-counterfeiting features such as transparent windows and holograms.

4. **Hygiene:** Plastic notes are easier to clean and more resistant to contamination, promoting public health.

5. **Recyclability:** End-of-life plastic notes can be recycled into other products, reducing landfill waste.

1           6. **Beauty and Aesthetics:** Plastic currency provides currency printers with a wider palette  
2 of colors and textures, allowing for gorgeous new redesigns of our US currency to coincide  
3 thematically with the desacralization and proposed name change. If we must redesign our  
4 currency, let's fully overhaul our currency to be truly remarkable and do it gorgeously, and move  
5 away from the Dead Presidents model of currency design, which the Plaintiff even holds as a  
6 form of graven image idol or hero worship that should be discouraged.  
7

8           7. **Variable Sizing:** The blind and visually impaired have trouble using US currency. By  
9 revising United States currency to be printed on plastic that's variably sized, an achievement and  
10 printing process that many other countries have mastered and perfected, the blind and visually  
11 impaired can in an instant know just like with coins how much cash currency they hold and how  
12 much they are handing away or receiving in exchange for goods or services, without relying on  
13 the unwieldy assistance of currency readers, smartphones, or strangers they may not have built  
14 a trusting relationship with yet. The "**Raised Tactile Feature**" RTF the BEP has long proposed  
15 as an accommodation for the American Council for the Blind has been indefinitely postponed  
16 and may even be too technically challenging to achieve, particularly on cotton-linen.  
17

18           Unlike the US currency, the Swiss Franc is "thoroughly redesigned every 20 years via design  
19 contest of the Swiss National Bank"<sup>15</sup>. In 2014/2015, a very-highly skilled amazing designer  
20 named Travis Purrington proposed brilliant, beautiful new designs for US currency that I want to  
21 share here, to give you an idea of what's aesthetically feasible for United States currency if we  
22 move to plastic printing and move away from the idolatrous Dead Presidents themes. He  
23 described his design goals as follows:

24           "The goal was to develop a USD submission including an updated iconographic system that  
25 re-interprets the advancements and culture within the American society. This particular series  
26 plays on themes of societal and scientific discoveries endeavoring to connect them to human  
27  
28

<sup>15</sup> Travis Purrington. <https://travispurrington.com/2014-usd-proposal>

achievement, multi-structured environments, cultural equity, and the fundamental properties of life."

Just imagine this gorgeous currency coming to life with just such a fundamental face lift, joined with a new retitling, provisionally as TRUST, CALM, or QALM... whichever or whatever wins the proposed national currency renaming contest:



I will not reproduce all of the detailed designs here, as those can be explored on Travis Purrington's website. I just want to show you the magnification of two of these designs, as

1 examples emphasizing our nation's accomplishments in the progress of science and technology  
2 and the stunning beauty of our natural resources. Should we worship Long-dead President  
3 Andrew Jackson as an idol, renowned for his racism toward Native Americans, or should we  
4 worship instead the achievement of being the first nation in human history to place astronauts in  
5 space? Note that the banknotes are different sizes with larger denominations being larger, unlike  
6 our current long-dead president currency, allowing the blind, visually impaired, children,  
7 adolescents, and adults to more quickly and easily identify and sort the value of the banknotes  
8 that they hold while handling banknotes. Such a change to the dimensions, design, and medium  
9 of the currency will require careful review, as there are many downstream effects of a full facelift  
10 or overhaul like necessitating a replacement of ubiquitous currency counting machines, which of  
11 course at least some members of the currency counting industry will likely fiercely oppose. IGWT  
12 cash-counting vending machines in the vending machine industry, for instance, would become  
13 some degree of out-of-date or obsolete depending on how far the Treasury goes with this effort.  
14 Most are already based on credit card readers, but I still find machines that rely on very  
15 traditional US coins that I can't transact with. The Plaintiff understands that there are sometimes  
16 surprising and steep economic ramifications to a very deep facelift or overhaul of our currency,  
17 but the Plaintiff argues those costs of going further than what's minimally necessary are so worth  
18 it to bear to celebrate our Nation's 250th Anniversary of Interdependence, applaud American  
19 achievements and culture without over-reliance on a currency culture of long-dead president  
20 worship, invite stunning American creativity and artistic expression, and set our printed and  
21 minted currency system up for the 21st and 22nd centuries.  
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## APPENDIX L: HONORING PRESIDENT ROOSEVELT (ROSEAVELT) WITH A PROPOSAL FOR REVIVED AMERICAN SIMPLIFIED NUMBER AND SPELLING SYSTEM

President Roosevelt, who famously and honorably eliminated the In G-d We Trust motto from the 01907 Liberty coin, was also a notable fan and champion of Simplified Spelling. I spell his name parenthetically here as Roseavelt to honor that initiative as well, an initiative that has been all but "forgoten" but that would be amazing if we could revive in small batches someday, to make modern American English (i.e. the language or dialect of **American**) an easier language for everyone, and a better candidate for perpetual natural dominant *lingua franca*. A tangential example of where Simplified Spelling could make an immediate impact is by shortening the pronunciation and spelling of the number "seven" to "sev", so that English speakers can competitively fit as many numeric digits in our working auditory memory loop as Chinese speakers, arguably our current fiercest competitors can, globally aiding mental math, arithmetic, recall, and OTP password fill operations -- supporting moving OTPs from six digits (1 in a million breach) to sev digits (1 in 10 million breach) or higher.

Our whole number system could be radically simplified to be something similar to the Chinese system of numbers (I propose: cutting every particle of meaning to just one syllable, without any of the complicated "teen" and "ten-ty" numbers, by competitive analogy to Simplified Mandarin: "sev hun three ten six dollars and ten eight cents" = \$736.18), which our country could adopt over the course of a "revolutionary" 02026 transition year, particularly with the increasing assistance of AI technical, commercial, and educational support. See the amazing *Handbook of Simplified Spelling* and the more immediately accessible article by Malcolm Gladwell in his book *Outliers* on the competitively super-accelerated elementary math education of Chinese speakers, an acceleration so enormous that it might even help us catch up and permanently not just recover but zoom past earlier American elementary school performance, saving potentially millions of years of mathematical confusion by young American children and American as Second Language adults trying to learn the American number system, benefitting for centuries from here from the rupture caused by pandemic learning loss and this proposed

1 effort now, with simplified "American" numbers, to catch rapidly back up.

2 I dream a little of gently declaring with fellow Americans thereby full independence of the American  
3 language from the older legacy of the English language "controlled" or co-controlled by the British  
4 People's and British Crown's tastes and conventions, and I know it to be a little dream considering all the  
5 existing momentum of English numbers over the proposed simplified American numbers, but dreams only  
6 can become realized if we make a concerted, collective effort to dream a little together, and this  
7 communication is a first step that might be supported by such a Precedent (President) as President Trump  
8 or a Party such as the Republican Party who have already historically changed the centuries-old name of  
9 the Gulf of Mexico to the Gulf of America by rapid Governmental decree. It would be easier to coordinate  
10 nationally, of course, if the Federal Department of Education still exists in some form if and when this effort  
11 at American numbers and American language gets decided. I know this is a tangent to the core argument,  
12 but I didn't know where else to fit this, and this idea of American numbers and, in general, the push toward  
13 an American variant of Modern English (American) is itself also quite important for the Department of  
14 Justice and all "superiour" and "inferiour" officers of the "Gouvernement", who might oppose or support the  
15 Plaintiff on this RFRA case, to bring to the Resolute Desk for serious "Roseaveltian" discussion. **Enuf is**  
16 **enuf**, our "langauge" (local area network **gauge**) should be simplified, gently and slowly piece by piece,  
17 starting, I suggest, with the number and metric system. It may go no further than that, but our language  
18 ("langauge") should be free to freely develop at its own pace, accelerated by the support of the latest AI  
19 technology and community social choice.

20 I will quote here at length from Malcolm Gladwell's Outliers under what I believe to be a "fair use"  
21 exception to copyright. I hope the author Gladwell would be glad that I'm doing so to share this with this  
22 Court, not angry. I purchased several copies of the book over the years, and hope to share these notions  
23 with the Court:

24 **II.8 "Rice Paddies and Math Tests" by Malcolm Gladwell**

25 "Take a look at the following list of numbers: 4, 8, 5, 3, 9, 7, 6. Read them out loud. Now look away  
26  
27  
28

1 and spend twenty seconds memorizing that sequence before saying them out loud again. If you speak  
2 English, you have about a 50 percent chance of remembering that sequence perfectly. If you're Chinese,  
3 though, you're almost certain to get it right every time.

4 Why is that? Because as human beings we store digits in a memory loop that runs for about two  
5 seconds. We most easily memorize whatever we can say or read within that two-second span. And  
6 Chinese speakers get that list of numbers—4, 8, 5, 3, 9, 7, 6—right almost every time because, unlike  
7 English, their language allows them to fit all those seven numbers into two seconds. That example comes  
8 from Stanislas Dehaene's book *The Number Sense*. As Dehaene explains:

9  
10 Chinese number words are remarkably brief. Most of them can be uttered in less than one-quarter of  
11 a second (for instance, 4 is "si" and 7 "qi"). Their English equivalents—"four," "seven"—are longer:  
12 pronouncing them takes about one-third of a second. The memory gap between English and Chinese  
13 apparently is entirely due to this difference in length. In languages as diverse as Welsh, Arabic,  
14 Chinese, English and Hebrew, there is a reproducible correlation between the time required to  
15 pronounce numbers in a given language and the memory span of its speakers. In this domain, the  
16 prize for efficacy goes to the Cantonese dialect of Chinese, whose brevity grants residents of Hong  
17 Kong a rocketing memory span of about 10 digits.

18  
19 It turns out that there is also a big difference in how number-naming systems in Western and Asian  
20 languages are constructed. In English, we say fourteen, sixteen, seventeen, eighteen, and nineteen, so  
21 one might expect that we would also say oneteen, twoteen, threeteen, and fiveteen. But we don't. We use  
22 a different form: eleven, twelve, thirteen, and fifteen. Similarly, we have forty and sixty, which sound like  
23 the words they are related to (four and six). But we also say fifty and thirty and twenty, which sort of sound  
24 like five and three and two, but not really. And, for that matter, for numbers above twenty, we put the  
25 "decade" first and the unit number second (twenty-one, twenty-two), whereas for the teens, we do it the  
26 other way around (fourteen, seventeen, eighteen). The number system in English is highly irregular. Not  
27 so in China, Japan, and Korea. They have a logical counting system. Eleven is ten-one. Twelve is ten-two.  
28 Twenty-four is two-tens-four and so on. That difference means that Asian children learn to count much

1 faster than American children. Four-year-old Chinese children can count, on average, to forty. American  
2 children at that age can count only to fifteen, and most don't reach forty until they're five. By the age of  
3 five, in other words, American children are already a year behind their Asian counterparts in the most  
4 fundamental of math skills.

5 The regularity of their number system also means that Asian children can perform basic functions,  
6 such as addition, far more easily. Ask an English-speaking seven-year-old to add thirty-seven plus  
7 twenty-two in her head, and she has to convert the words to numbers ( $37 + 22$ ). Only then can she do the  
8 math: 2 plus 7 is 9 and 30 and 20 is 50, which makes 59. Ask an Asian child to add three-tens-seven and  
9 two-tens-two, and then the necessary equation is right there, embedded in the sentence. No number  
10 translation is necessary: It's five-tens-nine.

11 "The Asian system is transparent," says Karen Fuson, a Northwestern University psychologist who  
12 has closely studied Asian-Western differences. "I think that it makes the whole attitude toward math  
13 different. Instead of being a rote learning thing, there's a pattern I can figure out. There is an expectation  
14 that I can do this. There is an expectation that it's sensible. For fractions, we say three-fifths. The Chinese  
15 is literally 'out of five parts, take three.' That's telling you conceptually what a fraction is. It's differentiating  
16 the denominator and the numerator."

17 The much-storied disenchantment with mathematics among Western children starts in the third and  
18 fourth grades, and Fuson argues that perhaps a part of that disenchantment is due to the fact that math  
19 doesn't seem to make sense; its linguistic structure is clumsy; its basic rules seem arbitrary and  
20 complicated.

21 Asian children by contrast, don't feel nearly that same bafflement. They can hold more numbers in  
22 their heads and do calculations faster, and the way fractions are expressed in their languages  
23 corresponds exactly to the way a fraction actually is—and maybe that makes them a little more likely to  
24 enjoy math, and maybe because they enjoy math a little more, they try a little harder and take more math  
25 classes and are more willing to do their homework, and on and on, in a kind of virtuous circle.

26 When it comes to math, in other words, Asians have a built-in advantage. But it's an unusual kind  
27 of advantage. For years, students from China, South Korea, and Japan—and the children of recent  
28 immigrants who are from those countries—have substantially outperformed their Western counterparts at

1 mathematics, and the typical assumption is that it has something to do with a kind of innate Asian  
2 proclivity for math.\* The psychologist Richard Lynn has even gone so far as to propose an elaborate  
3 evolutionary theory involving the Himalayas, really cold weather, premodern hunting practices, brain size,  
4 and specialized vowel sounds to explain why Asians have higher IQs.† That's how we think about math.  
5 We assume that being good at things like calculus and algebra is a simple function of how smart someone  
6 is. But the differences between the number systems in the East and the West suggest something very  
7 different—that being good at math may also be rooted in a group's culture.

8 In the case of the Koreans, one kind of deeply rooted legacy stood in the way of the very modern  
9 task of flying an airplane. Here we have another kind of legacy, one that turns out to be perfectly suited for  
10 twenty-first-century tasks. Cultural legacies matter, and once we've seen the surprising effects of such  
11 things as power distance and numbers that can be said in a quarter as opposed to a third of a second, it's  
12 hard not to wonder how many other cultural legacies have an impact on our twenty-first-century intellectual  
13 tasks...." *END PASSAGE.*

14  
15 The Plaintiff argues that the syllabic length of American number words is not an immutable law of  
16 nature. For the sake of our children and posterity we can "fork" American language from English language  
17 and shorten our number words, narrowing the gap between Asian counting performance and American  
18 counting performance among four and five year olds. The easiest step to start is just by shortening  
19 "seven" to the unoccupied "sev" and shorten "zero" to the unoccupied "ro" or the even shorter occupied  
20 "oh" (which can be confused with the letter "O" in alphanumeric strings<sup>16</sup>), and we can go gently forward  
21 from there, designing American language to be more fully responsive to the observed needs of our  
22 children and American Second Language (ASL) learners, simpler to count, to calculate, and to spell, as  
23 President Rosevelt hoped for in concert with the Simplified Spelling Board. President Rosevelt didn't  
24 have modern computerized spellchecking, computerized translation, and artificially intelligent educational  
25 supports like we do today to fuel the rise and success of Simplified Spelling. The Plaintiff argues we  
26 should give Simplified Counting and Spelling in the American language another serious go, since as they  
27 said in the 1920s, "enuf is enuf". **Let's close the gap and honor President Rosevelt's legacy in both**

28  
<sup>16</sup> At least when "O" isn't in an unambiguous alphanumeric system like Crockford's Base 32, where the letter "O" is removed to avoid confusion with the number "0".

1     **the design of Our United States currency and the design of Our currently most common American**  
2     **langauge. So as not to waste this design moment, let me advocate here for the "FIVETEN" (50) or**  
3     **"FIVETEEN" (50) denomination to be issued and spelled out.**  
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## APPENDIX M: 02015 Currency Renaming Proposal

### Crime-fighting, Conscientious Capital: A Quarter-Millennial Currency re:christening (Naming) Contest<sup>1</sup>



<sup>1</sup> Multiple test runs in multiple countries can powerfully confluence the deeply rooted longings that we all share for CALM LIFE, with \$TEAM<sup>4</sup> for the next generation. The most synergetic ally simplex can be selected for primary primacy, and the signal systems can be reviewed regularly for smartconsents as we re\$culpt our World. The word "Ripples" on currency may be close enough to Ripple Labs to constitute a trademark infringement. i'm not a trademark lawyer, this is a Conscientious Proposal for traditional currencies with high-optionality, was independently derived before I became aware of Ripple, and "Waves" has much of the same meaning, and could be synergetic with Ripple anyhow. The <sup>TM</sup> is included aside "Ripple" for total safety. Smart pick, in any case. Very evocative and naturally thought-provoking.

**18 Currency Titles With Historical and/or Cultural Implications**

*A Gift From Generation to Generation*  
*2025, 2075 & 2125 Tournaments, for the*  
*2026, 2076 & 2126 Celebrations*

PLEASE READ THE CAUTIONARY NOTE ON PAGE 2 BEFORE PROCEEDING

**PLEASE READ THIS FINE PRINT VERY CAREFULLY**

This document contains, or may contain, copies of the name of G-d, as integrated into or as taken from the national motto, "In G-d We Trust". Any kind of digital display and/or electronic storage of this document may be altered or erased by anyone, including Jews of any belief pattern, no matter their level of sensitivity for the English name of G-d, without any altering process or religious difficulties. However, if this document is printed onto media with PERMANENCE in any format, such as paper, parchment, or cotton/linen, the name of G-d if unhyphenated will qualify under Jewish religious law or custom as shaimos, and it requires ritual treatment if/when it reaches end-of-life. The fully articulated, non-hyphenated name of G-d may not be erased by Jews in HHAJ, like the Undersigned Author, who hold this understanding of shaimos, or by officers of the state acting in their official capacity, and the National Motto ("In G-d We Trust") and/or the even smaller area containing G-d's name, must be buried in a qualifying cemetery, out of respect for the indigenous religious custom, to enable the free exercise of religion guaranteed under the 1st Amendment: "Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof..." The Author follows Theodore Roosevelt in the belief that the printing of "in G-d We Trust" on currency is Wrong. Please consult the histories and herstories to understand the full range of religious dissent to G-D Shreds.

This document presently contains the National Motto, which contains an unerasable name of G-d, written on the following pages:

☐ No instances included yet.

**Before printing out this document, please affix your name and signature below, with a promise to bury all portions containing the name of G-d listed above as "shaimos of the second and/or third-degree". For suitable burial guidelines, please find a local Jewish cemetery, a rabbi, and/or contact the Author for guidance.**

**A PRINTING AGREEMENT**

I, \_\_\_\_\_, will print photocopy, engrave or enscribe (print/printing) a portion from this document. Before printing or photocopying any image of currency in color for any length of time, I agree to modify the image of the dollar contained herein to be less than  $\frac{3}{4}$  or more than  $1\frac{1}{2}$  times its official size in each linear dimension, as required by the US Secret Service Anti-Counterfeit Conventions.

I, \_\_\_\_\_, also agree that before printing any section of this document that is religiously sensitive onto hard media (such as paper, parchment, metal, or stone) in any form, I acknowledge that the print I am making includes a name of G-d in vernacular English within it—including but not limited to the National Motto—that the Author considers unerasable. The Author holds that the 1st Amendment proscribes any officer, employee, or contractor of the US Federal Government from shredding or burning the National Motto in its entirety or the English translation of the name of G-d in particular. If the print made reaches the end of its life, I agree to dispose of the print, restricted to any portion thereof containing the name of G-d, in a ritual burial, as required by the Jewish custom, and as interpreted by the Author.

NAME: \_\_\_\_\_ (in print)

TITLE: \_\_\_\_\_

SIGNATURE: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

WITNESS: \_\_\_\_\_

\_\_\_\_\_

EMAIL: \_\_\_\_\_

# Can We Save Life, Institute Inter-Continental Calm and Build Steam by Retitling US Currency?

*How do we celebrate the 240<sup>th</sup> [2016] & 250<sup>th</sup> [2026] Anniversaries of the Declaration of Independence?*

## Introduction

This is a modest proposal for an inaugural quarter- or semi-centennial or quarter-millennial open currency renaming contest, planned for every 25, 50, or 250 years. The aim of the contest will be to rechristen the US dollar (whose name originally emerged in the New World from the Dutch Leeuwensdaalder coin) in order to fight crime and cut Gordian knots in domestic and foreign policy goals. The contest choice architecture and rules can be structured starting shortly after the 240th (2016) Anniversary, when a Joint Resolution of Congress will establish an United Revolution Quarter-Millennial Commission (ARQC). The final rounds of the contest can be hosted and decided on the 249th (2025) Anniversary, and currency prints under the new title can be released on the 250th (2026) Anniversary of the Declaration of Independence. A domestic and global naming tournament can and will enhance the influence and preserve the global reserve value of our currency, while interfering with criminal rationalization and interrupting violence escalation at home and abroad.

It is often said that a picture is worth 1000 words. Eighteen | D:eight (18) sample currency names are presented on the cover sheet for your inspection. In the Appendices, you will find other critical supporting graphics, including lists, tables, a linguistic litmus test for name feasibility and a proposed schedule of contest milestones. Please note that any renaming contest will retain all existing design elements and security features of the extant banknotes in usage at the time of the tournament. The only alteration proposed for consideration is the name in small print, in order to dramatically enhance our currency's cultural achievements.

No doubt about it, the Signers deeply appreciated the earth-shaking importance of names and titles. For example, consider the fierce debates the Founders had over the title and honorifics granted to George Washington, the First Presiding Officer of the United States (Mr. President). Unlike "President", the Founders backed into the name "dollar". The word "dollar" came to us from the "daalder" in the Dutch Leeuwensdaalder, or Lion's Dollar, and the word "Dollar" in old Dutch and German translates into "Valley". The word "dollar" had evolved in a historical progression from "Joachimsthal" ⇒ "thaler" ⇒ "daler" (cognate to the English word for "dale", or valley) ⇒ "daalder" ⇒ "daaler" ⇒ "dollar". Joachimsthal was a valley used as a silver mine in Bohemia — St. Joachim's valley. The township is now called Jáchymov and is situated aside the Czech-German border, within the Czech Republic.

The Signers of the Declaration of Independence (Signers) did not originally intend for our currency to be named based on the availability of silver in the Czech Republic. The first banknotes issued after the Declaration of Independence by the Continental Congress were known as "Continental" and helped provision the Continental Army in 1776. The original title of our currency, a name shared by Congress and our first Army, the "Continental", expressed the

Founders faith in Manifest Destiny. The Continentals could be redeemed for what the Signers called Spanish milled dollars, expressed in shorthand as “dollars”. In reality, the Spanish milled dollars were Spanish “eighths-royal” (aka real de a ocho, eight real, or “pieces of eight”), which were highly-trusted silver coins minted in South America. To put it briefly, the Founders were allergic to any currency names that were identified with monarchy. Hence, they rejected the “pound sterling” system and also rejected the official Spanish name for the real de a ocho, referring to it as a “Spanish dollar” or “dollar” instead. The usage was natural, because the Spanish dollars were practically identical in weight and make to the Lion’s Dollar (Leeuwensdaalder) that was so commonly used in Dutch New Amsterdam, as both derived their standard of weight and make from older German thalers. The Spanish dollars from South America that the Founders relied upon co-circulated with early US coinage, and were accepted as legal tender in the United States until the Coinage Act of 1857. Before the Mint had been established, Robert Morris, the Superintendent of Finance under the Articles of Confederation, debated the establishment of a Unit of Account with Thomas Jefferson, who was then a delegate to the Congressional Congress, and the head of the Currency Committee. Morris proposed that the Unit of Account be based on the common denominator of the Spanish Dollar and the British Pound, subdivided into 1000 mils. Jefferson counterproposed that the Unit of Account be the (Spanish) Dollar, split into 100 cents. In the Founding Documents of the mid- to late-1700s, including the Seventh Amendment of the Bill of Rights, references to “dollars” were understood by early Uniteds to be a direct reference to the Spanish dollar, not the dollars that we know today.

A century ago, England’s Pound Sterling was the preferred global reserve currency. Today, the US Dollar represents over 60% of global reserves. Will the US Dollar remain the global reserve currency for the next century? The United States *Dollar* currently competes with the *Euro* of the European Union (24% of reserves), with the *Pound Sterling* of Great Britain (4% of reserves) and *Rounds* (translation of “Yen”) of Japan (4% of reserves) trailing in a distant third and fourth. We can anticipate that the US Dollar will compete in the next century for global reserve currency status with the *Euro* and the ascending *People’s Currency* (the English translation of “Renminbi”) of the People’s Republic of China.

The “Euro” and “The People’s Currency” are very modern names that audibly reinforce the pan-national and national identity of those within Europe’s and China’s monetary zone. The *Euro* got its name in a representative democratic fashion, after a schoolteacher named Germain Pirlot, a speaker of Esperanto, suggested the name to the then-President of the European Commission and was adopted by vote four months later at the Madrid meeting of the European Commission. *The People’s Currency* was so-named at the time the Communist People’s Republic of China was founded, and was imposed by the *People’s Bank of China* shortly after its founding, near the end of the Chinese Civil War. Only a handful of international currencies aside from these carry non-archaic meanings, but a few of those that do are worth mentioning. For instance, the West African Monetary Zone plans in 2015 to move to the “Eco”, a polyglottic reference to ecology, eco-friendly action, and economic potential. In Botswana, situated in the Kalahari desert, the “pula” is the medium of exchange. “Pula” means rain, which is a fitting term for a currency in a region where rain is so precious.

The Senate and House can take on an even higher global mission and sponsor a national and global currency retitling contest cycle — the first of its kind — to enforce, reinforce, and supercharge humanitarian values through commercial action at home and abroad. With wise contest rules, selection protocol and choice architecture, some extremely favorable effects, both major and marginal, are predicted. By imbuing the medium of exchange with added meaning, Congress can nudge trade ever so slightly, day-over-day, year-over-year, on a completely voluntary basis, toward wiser allocations and the achievement of the following goals.

## Goals of the Currency Retitling

Goals include major and marginal improvement in:

- ☐ Achieving the mission of our forefathers, as expressed in the Preamble of the Constitution
- ☐ Preservation of life
- ☐ Institution of global calm
- ☐ Building steam for STEM and arts education (matching educational achievement [currently in points] with wealth acquisition [currently in dollars])
- ☐ Violence prevention and conflict mitigation
- ☐ Softening of military conflict with diplomatic and economic soft power
- ☐ Interference with criminal rationalization (self- and social psychology of crime)
- ☐ Crush criminal networks from within
- ☐ Improvement of juridical and jury reasoning, especially related to financial crime
- ☐ Amplification of economic liberties abroad
- ☐ Simplified interpersonal and international economic sanctions
- ☐ Enhance our individual, local, state and national soft powers
- ☐ Establishment of eternal global reserve status for our ever-evolving currency
- ☐ Augmentation of cumulative populational Quality Adjusted Life Moments, Minutes, and Months (QALM) over this next Quarter-Millenia (2026 - 2276)
- ☐ Gently prepare non-democratic nations for a democratic future with embedded vote-based commerce

## What is America's most underutilized sound-bite?

In 2013 AD, 8.3 billion bank notes were printed by the US Bureau of Engraving & Printing. That *annual* production figure is larger than every Bible (~6B) or Red Book (~6B) ever *printed* in human history, and we know for a fact that our denomination of currency circulates and is vocalized more frequently than any Bible verse. The modern word "dollar" (hereafter presented in the archaic spelling, "daaler" or "daalder" from the Dutch "leeuwendaalder", or lion's dollar) is repeated many billions of times a day, both aloud and subvocally. The mere sight of the \$ sign triggers a sound pattern in the mind. The number of "unique impressions" per day is mind-boggling and innumerable. Considering just executed transactions—and executed

transactions are just a small fraction of the number of times we encounter the audiovisual signature of \$, "the dollar"—the Federal Reserve's 2013 Payment Study estimates that there were 122.8 billion non-cash payments in the United States in 2012 AD. Roughly 50% of US payments are still cash-based, bringing the total transaction count in US dollars within the USA to roughly 250 billion independent executed dollar-based transactions per year. 250 billion! Per year! That equates with trillions upon trillions of sound-bytes and mental rehearsals of the term "dollar" pre-, peri- and post-transaction each year.



This signifies that the retitling rights to the US dollar are an unbeatable world-class intangible asset, but Congress's power to rename our currency, a world-class creative work, has not been exercised since the 1780s-90s, when the name of our US Currency (USC) was shifted from US Continentals to the present US Dollar.

Yet tragically, the word "dollar" is not of its own evocative of the underlying moral ideals and commercial values of the United States. That's not surprising, since the word "dollar" has become an archaic word for a generic valley and a generic word for an archaic currency. Canada, Australia, New Zealand and many others all use longer-lasting plastic media for their currency, with the word dollar used worldwide as a generic term for "national fiat currency". When not otherwise specified, the term "dollar" defaults to the US Dollar, just as the term "dollar" used to default for our Founders to the Spanish Dollar. Arguably, the word "dollar" used on its own means nothing more (and nothing less) than "US Currency", carries no valuable secondary

or double meanings within its roots, and is much less evocative than the original term we used for our currency, the Continental.

Our Founders, starved for a reliable source of silver or gold, chose the term “dollar” so that our coinage and banknote production could be both supplemented with and backed by interchangeable Spanish-United milled dollar and Dutch Leeuwensdaalder coins. At right, you can see an image of the obverse and reverse of the 01739 Spanish “piece of eight”. Below, you can see an image of the Dutch Leeuwendaalder, or Lion Dollar, which was reputedly most responsible for familiarizing Uniteds with the term “dollar”.



**1739 Real de a ocho, aka the Spanish milled “dollar”, the eighth royal piece**



**1647 Dutch Leeuwensdaalder, aka the Lion’s Dollar**

The title of our Commander in Chief ("President [Presiding Officer] of the United States of America") was hotly (and thoroughly) debated by the Founders. Dozens of titles were considered, including until the term "President" was selected. Unlike the title of our President, our Founders did not have much time or sufficient security at the time of the Revolution to engage in a creative contest or debate about what the best possible lexeme (word), morpheme (unit of meaning), or glyph (symbol) for our currency would be. They simply borrowed the Spanish peso symbol from the Spanish (\$) and the term "daalder" from the Dutch Lion Dollar, just as smaller nations today choose to name *their* national currencies "dollar", without deep creative reflection. We are no longer in the same circumstances as our Founders. As of 02014 CE, two-hundred and thirty-eight years have passed since the signing of the Declaration of Independence. We are less than twelve years from the 250th Anniversary of Independence, the Quarter-Millenia Celebration. Now, n 02014, our Independence and our currency system are both secure and reliable. We are no longer starved for raw materials; we have all the copper, silver, gold, platinum, plastic, cotton, linen, ink, machinery, production and know-how we need. Now that we hold the world's most trusted currency and dominate the global exchange markets, we have an opportunity to reflect on our most sincere beliefs, embed those beliefs in the name of our currency, and deepen an United brand of thick human international values that can be spread and reinforced through international trade and diplomacy.

What if we were to re-identify the single most frequently used sound-byte of our culture—a sound-byte that triggers trillions of times annually—both here at home and abroad (the word "dollar), in times of peace and in times of war, with a direct, sonic invocation of fundamental human values, not just in the US but across the globe? By renaming the dollar, re-associating our currency with a different phonic, lexical, and even graphical signature, we can sound a cultural high-note heard 'round the world and accentuate the international goodwill of the United people with each successive utterance of our bank notes' name. Our local and global moral reserve currency is among the USA's most precious intangible assets — let's develop its potential further, scaling up from our present "valley" currency toward a more meaningful cultural summit currency name — moving from "thal" (valley) to a "berg" or "bergen" (mountain peak) currency name.

At Currency Calm, we believe that such a currency name change can preserve life and fight crime—both violent and financial—extending America's security system to the outermost reaches of our monetary system, and compounding common idioms (for example, "Keep your CALM" and "Keep CALM") with greater persuasive power in the context of violence prevention and interruption at a local, national and international scope.

### **What currency names may outperform the word "dollar"?**

The challenge, of course, is to find a word that can be adapted into a synonym for "US Currency" that is already invested with and grounded in positive cultural precepts that can be vocalized in two or fewer syllables and six or fewer letters, and appeals to all decent human beings, regardless of their political party or affiliation.

Words or mnemonics that invoke, evoke, or actualize global human ideals are preferable, particularly if they present us with a helpful rule-of-thumb for improved budgeting of our finite cognitive resources and/or constitute a call to philanthropic or pro-social action. Above

all, we must search for words that can preserve life if embedded into our daily commercial speech.

As a national and international contest, the Basic Contest Rules might begin something like this:

- Prizes will be awarded to all quarter-finalist nominators in both the domestic and international brackets, in the form of large-denomination US Banknote(s)
- All entries must be expressed in two vocal syllables or less.
- All entries, even in plural form, must be spelled in eight letters or less.
- Entries can be pluralized or unpluralized, and specified pluralization need not follow typical language convention (ex: 1 SPARK, **2 SPARK (verb)**, 5 SPARKS vs. 1 SPARK, **2 SPARKS (noun)**, 5 SPARKS).
- Entries that are acronymic or mnemonic are encouraged, and you can submit multiple permutations for the same acronym (ex: Permutations of 2 CALM: 2 Century/Congressional/Country/Continent/Classroom/Court/Clinically Assured/Adjusted/Altared/Altered Life/Liberty/Love/Labor Moments/Minutes/Months/Millenia/Miles/Meters/Measures).
- Entries need not be in the English, Spanish or any other major language. All languages are welcome, and every Ambassador to the United States from all countries recognized by US Government may submit one official entry to Congress for competition in an International Bracket.
- Entries may be accompanied by an explanation of no more than 1,000 words describing how the word would be used in idiomatic phrases and in cultural commerce
- Entries can be accompanied by a novel proposed currency symbol, even one that is touch-responsive on touchscreens and digital media, with a legally defined interactive pattern
- Entries may be authored by individuals, teams or institutions and submitted to an appropriate review body for a first review, in accordance with the contest rules

#### Selection Guidelines

- Entries that institute a mechanism for the preservation of life and liberty through enhanced idiomatic crime prevention, remediation or law enforcement will be given special attention.

#### Featured Names

#### Why STEAM?

STEAM is a derivative of STEM and stands for "Science, Technology, Engineering, Arts, and Mathematics." With STEAM as the name of our currency, we could impress upon children from a very young age that their classroom accomplishments in the STEAM subjects is the

source of success and the means by which they can run "Full STEAM Ahead" into a better world. Conveniently, the currency symbol for STEAM could remain the Spanish peso symbol (\$ = STEAM, or even \$TEAM)

### Why LIFE?

What is of more fundamental value than life? Honest, lawful participation in the local and global economy is life-giving and life-preserving. By denominating our economic system with LIFE, the sanctity of the institutions and personnel that protect and defend the regular, regulated flow of LIFE will become self-evident.

### Ripple Effects In Implementing Federal Policies and Powers

Imagine if domestic, foreign aid and defense budgets were explicitly modeled on LIFE. Economic sanctions against nations like Syria that threaten life will be simpler to apply, and would be modelled in multiples of LIFE threatened or lost.

If the United States is ever in a position where a Declaration of War is considered in Congress, we would be in a more powerful position to press our case first through economic diplomacy, as denominated in units of LIFE. If we ever need to intervene with force for humanitarian reasons, when we deploy boots on the ground those young soldiers will be investing and circulating LIFE within the economy. Why attack a soldier who is helping you secure the means by which your family may find LIFE? In Afghanistan, Iraq, Vietnam and North Korea — every major war zone of the US Armed Forces in the last half-century — dollars are accepted as legal tender. If our military must be deployed, why not deploy our military under the commerce banner of LIFE? Deploying under the commerce banner of the dollar is gravely suboptimal, and results in an almost insurmountable empathy gap, much lost civilian life, and seething local resentment and skepticism about the USA's intent in military intervention. I hesitate to say so with force, but all theoretical evidence suggests that changing the name of the dollar to LIFE or another highly humanitarian name is among the most effective unexplored nonviolent COIN strategies. The currency that is circulated in foreign countries would essentially act as a Shield of LIFE for all those who are exposed to it, establishing the protection of LIFE as the common ground for peaceful coexistence.

Remember, the 01993 and September 11th, 02001 attacks on the World Trade Center Towers by al-Qaeda were rationalized by al-Qaeda terrorists as an attack on the financial services sector, a manifestation of the "evil" Almighty dollar. It's harder to psychologically justify an attack on LIFE. With LIFE as our currency, terrorist networks like ISIS will have a more difficult time finding recruits financing terror, and planning attacks against the institutions that anchor LIFE. It will be easier for law enforcement and clandestine services to identify informants to break up crime networks that threaten human life by way of the theft of LIFE, in all its forms.

Audiences might laugh at comedians who joke about stealing dollars from banks. But would those same audiences laugh if a comedian joked about stealing LIFE? Financial crimes, like the over ✓50 billion fraud instigated by Bernie Madoff, are crimes not just against property, but against human LIFE.

Every monetary instrument has a natural opportunity cost measured in a quality or quantity of life. If LIFE were the name of the US Currency, getting invested in the stock market

would be an investment in LIFE. Your life savings would be a representation of how much LIFE you have earned. A person losing income to a bad investment would be losing LIFE. Corporate executives would ask one another, "How much LIFE can be saved or spared through better engineering? How much LIFE can be earned through improvements in sales?" The currency would stimulate small business and entrepreneurship as families strike-out to make LIFE work for themselves and their partners.

A natural conversation will emerge among everyone from the working poor to young professionals, from the LIFE indebted to LIFE billionaires, about how to spend, save, invest and share LIFE best: on luxury goods, creative works, services, donations or durable goods? Parents, grandparents and great-grandparents will be able to gift LIFE to the next generations. Donations to 501(c)(3) organizations in US Currency would be measured in units of LIFE. Of course, getting through life will cost LIFE. Need a student loan? Students can borrow LIFE, to be repaid as they earn LIFE post-graduation.

Achieving LIFE balance will connote both emotional adjustment and education-career planning. Small children could learn about how to budget, save and spend LIFE through one of the oldest United board games, Hasbro's (once, Milton-Bradley's) GAME OF LIFE. First printed here in America in 01860, before the outbreak of the Civil War, the GAME OF LIFE orients players toward the major decisions of LIFE. The Undersigned Author actually began investigating his eventual career as a science teacher after playing multiple rounds of the Game of Life; his preference for the career was revealed after repeatedly choosing "Teacher" as his profession, when other higher-paying professions were available to him.

LIFE also forms a convenient acronym: Life/Law/Labor/Love/Liberty/Literature Is Fundamental Everywhere. The LIFE currency would afford parents, teachers and policymakers many teachable moments.

What are some admissible drawbacks to renaming the USD to LIFE? For one, cashiers will have to say, "This box of Cheerios will cost 3 LIFE." That cost proposition may sound a bit strange to your ear at first, but we will all quickly get used to both value and cost propositions phrased in terms of LIFE. Granted, as long as the value of the good you're purchasing is greater than or equal to its cost, as it should be for all voluntary trades, you will only gain LIFE with each trade. On the plus side, the sticker price of a box of cigarettes will cost, say, 6 LIFE. On margin, we can expect cigarette purchases to become less frequent under a LIFE currency nudge. Second, the most natural currency symbol for LIFE would look much like the pound sign (£), a currency our Founders firmly rejected when they declared independence from Great Britain in 01776. We might design a distinctive L currency sign to use as a synonym with the Spanish peso (\$) symbol that we currently use to represent the dollar, or stick with the vote or Spanish peso symbol exclusively to describe 5 LIFE (✓5 or \$5). Third, LIFE (L) is not as easily translatable into a school context as QALM (Q), POINTS or MARKS. Not that it can't be done; just that it is slightly more awkward awarding 100 LIFE or 100L to students with a perfect test score than 100Q

### Why RIPPLE?

When you use a “ripple”, you will have an opportunity to reflect on the “ripple effects” of your transactions. Why donate to a charitable organization? Why contribute campaign funds to a candidate for local office? On the promise that with ripples from Us, you’ll produce waves for our community. Spend, save, and invest wisely: the more ripples We have, the easier it will be for Us to make waves. Children from a young age will understand our currency not as morally problematic in its nature, but as an essential tool for generating stability (“standing waves”) and change, with cash flow described in all the rich language that describes a wave: period, phase, amplitude, shape, cycle, wavelength, and frequency.

Sadly, the term “RIPPLE” is trademarked by RIPPLE LABS as a currency instrument. It’s the only notable digital currency or crypto-currency that I have found with a name that could cause true cultural “ripple effects”. All the others (Bitcoin, Litecoin, Dogecoin, Peercoin, Namecoin, etc.) are not cleverly named for widespread cultural amplification as a result of social adoption. No extant circulating currency that I know of is as well-named as “RIPPLE”. Shifting the US dollar to the US Ripple may require the exercise of “eminent domain”. Please consult with the US Patent & Trademark Office to be sure. Also, the abbreviation of the US RIPPLE currency would be “USR”, which is maybe too close for comfort to the abbreviation of the former Union of Socialist Soviet Republics (USSR). Uniteds who lived through any part of the Cold War (01946-01991) may express conscious or subconscious psychological resistance and revulsion at an abbreviation so close to USSR. If so, all terms starting with “R” are either out or require specialized abbreviation, such as “RPL”.

### Why WAVES?

Waves are a natural alternative to ripple. Want to change the world? Well, join a team and make some WAVES. Plus, the word wave is *not* trademarked in commerce as a transactional currency, like “RIPPLE<sup>2</sup>” recently was, so no exercise of eminent domain will be required with the WAVE, at least as far as I know.

### Why CALM (kalm)?

The CALM, or the C, is a sibling of the QALY, a mission-critical public health metric that stands for “Quality Adjusted Life Year”. The CALM mnemonic at its most basic stands for Character Altering Life Moment, but the currency extends to four major temporal horizons: Moments, Minutes, Months, and/or a Millenia. With enough CALM in our domestic and foreign affairs, we can even enforce a calm, peaceful Millenia, with trade sanctions denominated in and driven by lost CALM (which mnemonically represents life, liberty, time, travel, and treasure). By

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<sup>2</sup> See, for example, USPTO Trademark Registration #86052980. Trademarked by Ripple Labs Inc. The Ripple is the only cryptocurrency to emerge with a name that could substantially shift the sociolinguistic culture of international trade if it were widely adopted as the name of a major governmental denomination. As of 6:32 PM on July 8, 2014 1 Ripple (XRP) = 0.0036 USD, and all XRP issued to date sums to just 26.5 million USD in market cap. The Treasury could gobble up the Ripple (pay fair market value) with what it prints before breakfast, under eminent domain. There is no trademark whatsoever on QALM.

imprinting our currency with CALM, we will interconnect health and wealth in marginal socio-economic and socio-educational decision-making. Does a cigarette buy you CALM? You might enjoy the cigarette for a brief moment, but how many life minutes and life months will it cost? How will the purchase of cigarettes alter your character?

**CALM (*kälm*):** US Global Reserve *Monies* that trigger and sustain a *mood*

C: Choice / Character

A: Altered / Adjusting

L: Life / Liberty

M: Moment Month Measure, Milestone

{Moment, Minute<sup>3</sup> Month, Millenia (Choose a Time Horizon)}

{Mile, Meter (Choose a Distance Unit)}

US CALM (USC): A currency that encourages questions (Qs) in commerce to secure a global millenia of QALM.

CALM also qualifies as a transitive verb, so the 2 CALM bill acts as a magnificent declaration of eternal domestic and general international purpose.

An important feature of the "Altered/Altared Life Month" Family (CALM, QALM and ALM) is its use in the application of trade sanctions against a belligerent or hostile country that poses a national or international security threat. If and when a major or minor international leader turns belligerent or acts aggressively toward its neighbors, like President Putin of the Russian Federation recently has done and threatens international calm, his administration can be penalized rapidly with trade embargoes public and private denominated in CALM (Character Altering Life Moments) or QALM (Quality Adjusted Life Months) for interfering with international calm. The populace in the Russian Federation would understand that threatening the calm and territorial integrity of their Ukrainian neighbors will beyond doubt lead to consequences in their own balance of CALM through both private and international action to restore the balance of calm.

### **A Name In Two Parts: Currency Title and Denomination**

Like the Chinese "People's Currency" (Renminbi) denominated in the Round (Yuan), or Great Britain's Sterling denominated in the Pound, the US could present to the world a 1-2 cultural punch: a fresh formal currency name with a calm formal currency title. For example, the US Ark (USA) Currency, introduced by the United States ARQ Commission, denominated in CALM.

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<sup>3</sup> Dr. Vicken Totten, MD, MS, FACEP, FAAFP, was the first person who mentioned the QALM acronym, expanding it to "Quality Adjusted Life Minutes", an adaptation of existing QALY (Quality Adjusted Life Year) usage. From there, the four horizons ("Moments, Minutes, Months, and Millenia") quickly fell into place.

## **How does the cultural capital unleashed by the RE:Naming Contest Tourney translate into human capital development?**

Great question! Let's turn to Germany for a historical example. I'll focus on one example of how human capital development can be transfigured through a more intimate linguistic interlinkage of financial currency (currently dollars) with the educational currency (currently points).

For 126 years, students *and* workers in Germany earned "marks", from the adoption of the Mark as the sole legal tender in unified Germany in January 1st, 01876 until the Euro's entry into circulation on January 1st, 02002. Meaning, throughout their education and subsequent working lives, marks were awarded for strong performance. Better "marks" in school suggested stronger future salaries denominated in marks. At no point did students disjointedly switch from "100 points" to "4.0 GPAs" to "dollars", as they regularly do in the United States. Anyone who was abruptly transferred from a 100 point to a 4.0 grading system knows how important a consistent grading scale is for sustained performance. A student who consistently earns ✓100 on her science and math exams has many more possibilities for career achievement in STEM occupations. By representing homework, quiz and test grades in terms of our native currency system, students learn to esteem their performance in terms of the promise of future career earnings and options.

It would be ideal to select a name for US currency that can also serve as a denomination for classroom points in United education. Doing so will reinforce the motivational substructure at all points along the "cradle to career" pipeline. That holds true even if we recommitted to the name "dollars" to denominate education and market performance.

On the other hand, if, for example, the currency were called QALM, teachers could award students Q for good questions, and tests could be graded in terms of Q100 (prefix notation), or 100Q (postfix notation). Good Qs lead to As, and As lead to more Qs. A perpetual self-reinforcing QALM cycle can be launched starting in grade school as students learn how to ask a good Q and provide solid As in order to improve all their Life Measures and invest their efforts into capitalizing Life's Meaning. It's my belief that QALM is very close to a global optima for an education-centered currency title.

## **Who would nominate names for legislative consideration?**

Let Senators, Congresswomen and Congressmen, citizens, and resident aliens submit entries into a *Global Naming Contest*. (For a sample list of Name Nominators and Stakeholders, see Appendix Five.) Open up an international bracket. Curate national and international submissions through separate Blue Ribbon Panels, with the final candidates selected by a Congressional Committee and approved by Congress. This naming contest ought to be as inclusive as possible. America thrives off a melting pot of ideas that emerge on every continent. Just introduce sensible guidelines, to filter out improper influence and suggestions. You can even design the inaugural naming contest to repeat on a preestablished half- or quarter-centennial cycle, so that each generation can evolve the title of our currency such that it remains the preeminent global exchange medium and the prevailing storehouse of financial and moral value in international markets for centuries to come. You can even release the runner-up

currency name in a limited edition print run, as an accompaniment and adjuvant to the primary global currency therapy.

### **A lever that can move the world forever... with surprising cost-efficiency...**

Changing the name of the dollar (with no change to its underlying value) will cost no more than swapping out the word "dollar" for "RIPPLE", "QALM" or "CONTESTWINNER" in the printing plates at the Bureau of Engraving and Printing. The print difference is for most denominations less than 1 ½ inches long, and can take place in the same font, font size and location that current dollar designs use. The newly printed currency name can be slowly introduced into the currency supply at the regular replacement rate. The cost of change will be negligible compared to the ripple effects that such a change will institute in popular commercial culture. This therapy—a currency rename—will do a dramatic amount of good, and may help to repair our relationships with currently hostile foreign populations. Imagine, for instance, if our currency were named LIFE, as a mnemonic for Life, Labor, Love and Liberty Is Fundamental Everywhere. An attack on the World Trade Center would then be an overt attack on LIFE. Such a currency name would introduce cognitive dissonance into the minds of would-be attackers bent on attacking or undermining our currency, and would serve as its own counter-terrorism policy. A smoker's friends can suggest a smoking cessation product as a cost-saving measure, since "smoking is such a terrible way to spend LIFE." Can you imagine the discursive possibilities?

### **Is there any hard evidence that language affects economic behavior?**

Yes! Keith Chen, an economist at UCLA, published a paper that exemplified the Sapir-Whorf Hypothesis, titled, "The Effect of Language on Economic Behavior: Evidence from Savings Rates, Health Behaviors, and Retirement Assets." He found that native speakers of languages with weak future tense ("I go tomorrow") compared to native English speakers with strong future tense ("I will go tomorrow") adhere more thoroughly to a wide-range of future-oriented behaviors simply because of the presentist manner that their native language frames intertemporal choice. Chen "discovered that speakers with weak future tenses (e.g. German, Finnish and Estonian) were 30 percent more likely to save money, 24 percent more likely to avoid smoking, 29 percent more likely to exercise regularly, and 13 percent less likely to be obese, than speakers of languages with strong future tenses, like English" (Thompson, Atlantic Monthly). He explains most of the variation by suggesting that in weak future tense languages, like his native Chinese, there is less disjunction between an individual's present self and their future self.

Can we simulate a portion of these same effects with a change in our currency name? One of the proposals advanced here, the QALM (or USQ), has built within it four temporal frames (Moment, Minute, Month, Millenia) and is a sibling of the QALY, a foundational metric for

public health accounting, to nudge US currency users toward intertemporal choices that are, on margin, healthier.

### **With a name change, will any denomination value gain prominence?**

That depends. For instance, any verb printed on the Jefferson bank note (Q2) will form a homophone with the full-infinitive verb, e.g. "to calm". In an initial print run, you might consider asking the Bureau of Engraving and Printing to release design specimens for the new ✓2 bank note first as the public face of the new currency title. Doing so will send the message loud and clear both at home and abroad that the new US currency name is dedicated "2 (TWO) CALM", "2 (TWO) LIFE", "2 (TWO) TRUST", "2 (TWO) PROVIDENCE" and/or "2 (TWO) PEACE". No other bank note is likely to be boosted as much in cultural exchange as the ✓2, but the ✓2 will likely remain relatively rare in commercial exchange nevertheless.

### **So, how does this work, in mechanical terms?**

- 1 USD will always equal 1 USC (1 US Currency Contest-winner), forever. There will be no change in the exchange value of US Currency — the exchange of USD:USC will be 1:1.
- The design of the 1, 2, 5, 10, 20, 50 and 100 bank notes will not change as a result of this contest— just the name that is printed to describe the denomination.
- All security features and printing processes are held constant.
- In proposal stage, the symbol of the USC may be something other than the \$ sign. For instance, the 5 QALM might be represented as 5Q or Q5 rather than \$5, or have an altogether novel glyph to facilitate triggered recall of the USC's name; in the Contest Finals, a symbol change (as a symbol-synonym or symbol-swap) is up to Congress to decide. (I predict that a symbol change, though very useful, would be defeated, but a voluntary symbol synonym would be broadly adopted as supportive of the USC Priming Initiative.) I would propose "✓" as the provisional currency symbol, to represent the value we place on democracy. The ✓ can be combined and embedded inside any character with a circular center, like C, Q, O and D, and many other characters, like A and L, given slight allowances.
- The USC will not be printed unless it actually represents a real nominal (naming) improvement over the USD.
- The USC and the older USD will both be accepted everywhere in the world as legal tender, backed by the full faith (and credit) of the US.
- After a highly selective Congressional contest process, Congress authorizes the US Treasury to print the USC alongside the USD, with all factors held constant except for the name of the currency
- Cash-Accepting Equipment Manufacturers will have four months lead-time to update their Optical Recognition Software, as necessary, based on US Treasury Design Samples.

- The USC is gradually introduced into the monetary supply, starting with limited print runs in test markets as damaged currency is replaced.

### **How do I propose and support the passage of this dollar naming contest?**

You and your staff are far more experienced and knowledgeable than I am with the choice architecture and protocols of the legislative process. If you'll allow me to be so forward as to suggest a path, you might start with a conversation within the Ohio Caucus, to draft a bipartisan bill on the topic proposed and advanced by both Senators from the State of Ohio.

Please engage the US Treasury Department and Federal Reserve, consult with cosponsoring members of the Subcommittee on Economic Policy of the Senate Committee on Banking, Housing, and Urban Affairs during the drafting process, and send the bill over to Banking, Housing and Urban Affairs for mark-up. Pull in Expert Testimony (historians, sociolinguists, economists, and choice architects, to name a few) and secure time for Public Hearings and Public Comment, from commentators both local and global. Perhaps other "dollar" currencies will follow our lead. We can enrich global commerce and trade culture through a massively open and collaborative naming contest.

You might also start by directly engaging the press and schools in the State of Ohio — ask newspaper editors to solicit and print the best names that Ohioans can summon for the dollar. Attach a reasonably high set of rewards for names that successfully compete in the final brackets of the contest and achieve positive cultural, commercial or diplomatic ripple effects. Let rivers of ink spill forth in the newspapers of the world. Challenge every child in public or private school to win their school's contest for a better term of art than CALM (ARK or LIFE) to capture the mission and underlying values of USA action and commerce.

### **Are there any warnings you want to offer us about any of the currency names you've mentioned?**

Besides that already mentioned, the CALM family may lead us toward two competing portmanteaus: CALMocracy and CALMunism. Supporters of QALM currency might get branded with the CALMunist label.

I'm a firm believer in capitalism. I am very reverent toward the natural and social mechanisms that make capitalism function so well, and I am as far as can be from communism of any variety. That said I would be proud to identify myself as an advocate of CALMocracy and, in print, I would be able to point out easily that I'm a CALMunist but not a communist, or more simply, a CALMocrat and not a communist. Then again, if we can persuade the Communist Party of China to swiftly swap out communism for CALM, the world would surely be a better place. By offering CALMunism as an alternative to Chinese Communism, we can help China gently—and without loss of face—back down and away from its present communist economic practices.

No doubt, if you choose to champion the CALM family (QALM, CALM or ALM) you will want to talk through how to respond to the CALMunism charge in a way that reflects both your steadfast capitalist approach to all affairs domestic and international and the national and

international interests of the People of the United States committing to calm as a challenge to communism.

I can also foresee CALM launching a number of decentralized political movements and policy initiatives that could enhance quality of life in unexpected ways over the century or half-century. For example, imagine the emergence of match-making services that seek to establish CALM through a "Century Assured Life Match" — a partner and spouse whose habits and attitudes predict an unbroken century of matrimony. Such an institution would help reinforce marriage and systematically reduce our divorce rate by adopting the long-view of a centurion's decision algorithm. There may also someday be "Century Assured Life Movements" built from the CALM that pressure government to reach or even exceed productive life expectancies of a century. To pull this last issue into high-relief, consider a currency called LIFE. How much LIFE should we spend at end-of-life versus beginning-of-life? At what point does end-of-life care turn into a bad LIFE investment as compared to the needs of future generations?

I sincerely believe debates about Head Start and End-of-Life budgeting would be easier if CALM or LIFE were the name of the currency. A reasonable citizen would not often say, "I would have you spend all the LIFE in the world to keep my father alive." On the contrary, the discussion of a move toward palliative and hospice care would feel different if the currency were called LIFE. A reasonable market-limit on LIFE would emerge for the preservation of life in public policies. Implicit/shadow pricing methods used by economists already show statistical LIFE values for life at the EPA (6.9 million), FDA (7.9 million), and Department of Transportation (6 million). Is that low or is that high? Should we extend the life of a terminally ill, suffering patient against his will by three weeks, at a cost of 4 million LIFE, when with that same sum we can save 100 lives with more careful oversight and federal review of GM automobile design alterations? That's a serious budgetary question, and must be taken seriously. Health economics would be much simpler under a LIFE currency, since severe irrationalities in how we distribute finite capital resources across the age spectrum could be highlighted as causative or correlative of a true shortage or wastage of life, as appropriate.

### **Any suggestions for a new currency symbol?**

Introducing a currency symbol that is legally synonymous with \$ to accompany the currency name could accelerate us toward a number of crucial US priorities, including, for example, the emergence of strong democratic republics through citizens coordinating commercial choices. For example, if a ballot box or voting symbol (✓, Unicode+2614, or on special occasions ☑, Unicode U+2611) were in-laid within the first initial of our new currency title, consumers could be encouraged to think of their commercial transactions as the daily exercise of "commercial endorsement" or "commercial vote". If enough people no longer CALMly "vote" for a business in their community, that business will eventually die. I speculate that individuals accustomed to the notion of CALMly voting for the continued existence of businesses that support community CALMly will be primed to adopt the calm and orderly voting traditions of a representative democracy.

If LIFE is chosen the most obvious currency symbol would too closely resemble the currency symbol of pound sterling. If Q were the currency symbol, the USQ abbreviation would

be a novel entry into foreign exchange, and the USQ would naturally empower us to ask Qs before entering into a transaction denominated in USQ. Alternatively, if the US Currency Cultural Contest selected the US Alliance (ex: 10 Alliances), a \$20 would be denominated as 20 USA (rather than 20 USD, as at present). USQ and USA are both competitive.

The Ripple would abbreviate into USR, which you might want to avoid for its proximity to the acronym of the Union of Soviet Socialist Republics. The USR abbreviation is not very competitive.

Any currency name that starts with S, such as US Springs or US Sparks, would abbreviate to USS, and could serve as a long-term stimulus to USS Enterprise. I don't advise starting a currency name with S because it will be awkward handling the sibillence when its followed shortly after with the word "cents".

Using C as the base letter for a new US Currency symbol may be wise, especially if you choose CALM, or if you anticipate repeating this US Cultural Currency Contest (USC) periodically (eventually every 25 or 50 years), perhaps with contest selection completed on the following schedule: 02025 02075, 02125, 02175, ad infinitum, such that the new prints reach the currency supply on anniversaries of Independence Day (250th — 02026, 300th — 2076, etc. ad infinitum) Please see the attached Appendix Three for a more detailed sample tournament schedule.

In rank order of personal preference, I would suggest for our currency's three letter abbreviation USA (for US Ark or Arc, in reference to the United Revolution Committee), USQ (for US QALM and US Questions), USC (generically, US Currency and specifically, US CALM), USA, and USD in that order, with a general preference for currency names that start with Q, C, or D. All three of these letters will support an internal voting symbol within the "counter" (the circular inner portion or bowl) of the glyph.

The currency symbol should be designed not just as a static but also as a dynamic object, with design elements that emerge (or are activated) in response to a touch. Imagine standing in front of a sale terminal at CVS. After you ring up your items on the electronic screen, you can press any portion of your itemized purchase screen to activate the vote on that product. By tapping the screen, the default display of Q will change into Q✓, sending an appreciative signal back to the retailer and even the manufacturer. A POS system can even be designed whereby if you tap twice, you move from Q to Q✓ to X where X symbolizes a customer complaint. Imagine if such a PMS system existed at Walgreens, and on each Election Day, consumers were free to vote for or against their business carrying cigarettes and other QALM-destroying or QALM-enhancing products with a nationwide Q✓ or X campaign. Permitting such mass consumer action through Consumer Voting Days would hasten the day where we live in a peaceful, prosperous world, and, I would furthermore predict, that if it fell on the same day as votes for public office, would as a side effect drastically increase Public Office Voting turnout in the United States to previously unimaginable numbers. The custom of National Customer Voting Days that coincide with National Elections can fuel and accelerate the adoption of democracy in all free market systems, and could improve business and governmental decision-making by expanding the range of feedback that business and government can ethically collect from citizens. All this becomes possible with a touch-responsive currency symbol.

Even without a touch-responsive currency symbol, if the currency were named like CALM, citizens could engage in CALM BOMBS — the CALM equivalent of a cash mob — a sudden explosion of cash at the register for firms that take a positive step within the commercial community.

The currency symbol will have to be highly-legible at all standard print and digital display sizes. It can be multicolored, but must print well in black and white. It must be easy to write, take no more than three pen strokes, and must be as fast or faster than writing a Spanish peso (\$) symbol. Its design elements must communicate and reinforce the mission and values of the United States as a Light Unto The Nations. Of the currency abbreviations recommended above (USQ, USC, USD and USA), Q, C and D can each be written at a faster rate and with fewer pen strokes than the single- and double-barred Spanish peso (\$) sign. Try it; you'll see. The voting mark is an optional expression.

On voting days and at poll booths, the checkmark might be surrounded by a ballot box to reinforce its signification as a civic/consumer voting decision. This depiction of the Q for QALM symbol is colorized in Old Glory Red and Old Glory Blue.



**Q for QALM**

**Example Formal Currency Sign**

*Q in Optima Font, Embedded Ballot Box with Check (Unicode U+2611)*

Whatever you choose to do with the currency symbol, *please* do not do anything to outlaw the Spanish peso (\$) sign or dissuade anyone outside of government from using the old Spanish peso ( $S^P \Rightarrow \$$ ) symbol, if they want. Leave it up to individual enterprises to decide whether and when they want to adopt the new symbol or stick with the old design. Changing the currency symbol in store signage, receipts, forms and databases may be time-consuming and expensive if not done on an optional and incremental basis. If you do decide to implement an improved currency symbol, such as the Q (Q, Q✓, possibly X) or C (C, C✓, possibly X) fingertap progression (both of which would be a manifest improvement over the static Spanish peso [\$] sign) and ask businesses to comply with the change in touch-sensitive POS screens in order to implement Consumer Voting Days, please phase it in and give large and small enterprises plenty of lead-time to cost-effectively update all appropriate interactive interfaces. A four-year and eight year transition time frame for large and small businesses respectively seems fair — the period permitted for one and two Presidential elections. That way, if they want to, small or midsize businesses can sit on the sidelines and observe how the first Consumer Voting Day goes before they ascend with their own implementation. If the preparation or

execution of the first such Voting Day (Civic and Consumer QALM) demonstrates that there are kinks in the legislation or administration of the program. you can adapt the program so that it better fits the capacities of small, midsize and large companies and the needs of citizens before the full Voting Day system works.

### **What about other countries input and response?**

The influence of USD extends to those places where USD is used exclusively or almost exclusively (British Virgin Islands, Caribbean Netherlands, East Timor, Ecuador, El Salvador, the Marshall Islands, Federated States of Micronesia, Palau, Panama, Turks and Caicos Islands) and those that use the USD as legal tender in parallel with other currencies (Iraq, Afghanistan, Vietnam, North Korea, Haiti, Bahamas, Barbados, Costa Rica, Belize, Bermuda, Uruguay, Cambodia, Lebanon, Liberia, Zimbabwe, and Somalia). These sovereign nations and territories where the dollar is commonly traded comprise tens of millions of souls.

All those nations and territories listed above should be invited to participate in the RE:Naming Contest with Ambassadors, Ambassador designees or serving as panelists on an international bracket, with an appropriate, equitable and inclusive formula for representation determined at a later stage in consultation with an organization like the US State Department. As needed, those nations above should be given an invitation by the US Treasury Department following the RE:Naming Contest to update their legal codes for acceptance of USC (US Currency Contestwinner) as legal tender as of the date of its planned introduction.

Likewise with the other dollar basket currencies. Our neighbors, trading partners and friends in the United Nations who trade with the "dollar" family (Canada, Australia, New Zealand, Hong Kong, Singapore, Taiwan, Jamaica, Cayman Islands, Fiji, Namibia, Rhodesia, Zimbabwe, Namibia, Nauru, Saint Kitts and Nevis, Saint Lucia, Saint Vincent and the Grenadines, the Solomon Islands, Brunei, Dominica, Grenada, Guyana, Antigua, Kiribati, Trinidad and Tobago, and Tuvalu) should be invited to participate at a high-level. If they want to run their own currency renaming competition or conditionally peg their currency to our naming system, they should be more than welcome to do so. If we invite all nations to participate in a meaningful way through an international bracket, with special consideration granted to Most Favored Nation allies through all appropriate channels, through Central Bank, Embassy or WTO relationships.

Notice that Iraq, Afghanistan, Vietnam and North Korea — all of which were combat zones where the United States Armed Forces engaged in a major troop deployment in the last fifty years — use the dollar in parallel with other currencies. Major and extended US troop deployments invariably shift the local economy toward adoption of our bank notes, currently in the denomination of the dollar. If this aspect of force deployment—dollarization—is going to remain a side effect of international conflict, would it not be wiser for us to transform our currency into a pacification tool? Would we not rather invest CALM, QALM and LIFE into Afghanistan and Iraq? Would the President of the United States prefer that soldiers in Afghanistan invest dollars into the Afghan economy or invest CALM? Doing so would have a CALMing effect and could help, on margin, alleviate the tension between troops and the local population in a time of war. A CALM currency could also shorten the duration and lower the

intensity and frequency of conflict. Life-centered, CALMing currencies would help mitigate violence in US combat zones (past, present and future) through market penetration of our new currency and the philosophical ideology behind them, leading to negotiations and conflict avoidance strategies that jointly save CALM (Confirmed Afghani & All American Life Months).

### **Will anything be lost in translation?**

At first there will be some degree of lost meaning in countries that do not commonly speak English. However, English is the lingua franca of the world, and the selected currency name will likely be assimilated into practically every world language. We can be confident that the word selected will enter as an anglicism into all languages, major and minor, that have trading relationships with Uniteds. Each serious contender can be reviewed by the State Department for equivalencies in National Security Languages outside the term's original language family. For instance, English words can be reviewed for equivalents in Arabic, Mandarin Chinese, Russian, Hindi, and Persian. Each entry can be reviewed by the State Department for colloquial compatibility with the major languages spoken on Earth, listed in order of total speakers (Wikipedia<sup>4</sup>): Mandarin, English, Spanish, Hindi, Bengali, Portuguese, Russian, Urdu, Indonesian, Japanese, German, Javanese, Telugu, Wu, Korean, Tamil, French, Marathi, Turkish, Vietnamese, Italian, Western Punjabi, Cantonese, and Arabic.

### **What else can be done to improve our currency system's or our democracy's health and longevity?**

You're still with me? The brief proposals that follow are projects that I would recommend you consider separately from the RE:Naming Proposal above.

Why are we still using paper (cotton and linen) currency? Why does Crane & Co. have a monopolistic lock on the production of our currency? Every other major economy has moved over to more durable and colorful plastic currency that is, overall, far less expensive to manufacture and maintain. You can pay for thousands of student years of high quality public school STEM education with the savings that a switch to plastic currency would bring. Going from paper to plastic would be an outstanding LIFE trade.

Does anyone use pennies anymore? Please try to take firm steps toward deprecating the penny and possibly the nickel, in that order, from circulation, as they both cost more to make than they are worth in trade, and most people consider them a hassle to deal with in everyday life.

To facilitate the transition, the New Zealand playbook for eliminating obsolete coins is worth following. New Zealand has an excellent policy already developed for just this objective. As of the document print date, the New Zealand dollar is worth 0.88 USD, yet in New Zealand no one or five cent physical coins are permitted in daily consumer commerce — the smallest piece of physical change is the ten cent piece. Allow all businesses to continue to list prices and sell goods and services of any value over electronic and credit card commerce (✓3.99), but

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<sup>4</sup> This paper would not have been possible without Wikipedia.

require that businesses accept payment from the usual minority of consumers using cash at a price rounded down to the nearest nickel (✓3.95). Forbid businesses from accepting physical pennies ("pennies") after a certain date, but permit persons to redeem their pennies at the bank for their face value, or through a donation to a favorite charity. As in New Zealand, billions of pennies will be donated to charity this way, representing millions of dollars of philanthropy, and ridding us once and for all of the pernicious penny in domestic commerce. With our pockets and change purses freed up, we will all be more inclined to carry around 1Q (✓1) coins than we have been in the past. Abraham Lincoln, whose presence on the penny will be sorely missed, will always be honored on the 5Q (✓5) bill. In coinage, we can also honor him with the first 2Q (✓2) bills or coins printed, at the pleasure of Congress.

It's very likely that the low level of adoptance of the ✓1 Presidential coin is very closely related with the ongoing life of the penny and nickel. If the penny and nickel were eliminated, the expected value of change would rise to a dime and quarter minimum, and Uniteds would have more space in their wallets for dollar coins with wallets unencumbered by pennies and nickels. If you want to encourage adoption of the ✓1 coin, start by clearing out the penny and nickel using the New Zealand playbook

The penny and more so the nickel may remain essential within developing nations, so please consult experts in global microfinance on the exchange value of the penny so as to tread cautiously with respect to deprecating the penny in international markets.

Lastly why is our currency the only major OECD currency that can't be easily read by the blind and visually impaired? Basically every other major currency comes in a size spectrum, with bills (2, 5, etc.) also ordered by increasing size. I understand the resistance of NAMA (the National Automated Merchandising Association), but nonetheless, the writing has been on the wall for decades now that a change needs to be made. I know that the Director of the Bureau of Engraving and Printing, Larry Felix, has some strides towards usability and access for the blind and visually impaired by introducing an iPhone app and a portable bill reader machine, and I want to applaud the BEP for executing that work. There is still significant room for improvement, and we all know what it will take to get there.

So, at what point will Congress move on plastic bank notes, the removal of pernicious pennies and nickels, the removal of dollar bills from co-circulation with dollar coins, and resized bank-notes for the blind and visually impaired? These are battles that I would hold off on or treat separately and isolate from the RE.Naming contest, so as not to add any unnecessary confusion to the legislative process or introduce too much change at once.

I sincerely believe that implementing the combined and reinforcing consumer commercial rights and design elements expressed in this document will lead to a more peaceful, calm, and pluralistic world where, with US Currency denominated in a more CALM form, we may reprove nations that disturb international QALM through conscientiously non-violent means. Renaming our currency to something as fundamental as CALM, QALM or LIFE will improve the sensitivity, efficacy and effectiveness of trade sanctions and commercial isolation. The potential benefits are staggering, including but not limited to the benefits in interpersonal and international violence prevention through the introduction of new and more easily accessible diplomatic linguistic forms. It is my belief that through improvements in commerce and the medium of international and domestic value exchange, we will find a diplomatic pathway

toward that day when we will '...hammer [our] swords into ploughshares... [n]ation shall not lift up sword against nation, neither shall they learn war anymore. For the work of the righteous shall be peace, and the effect of the righteous, QALM and confidence forever." (Isaiah 2:4). This medium of exchange has long been recognized by authors as old as Adam Smith—one of my namesakes—as an exchange not only of value, but also of moral sentiment. In the Abramic (JudeoChrIslam) tradition, which 80.7% of Uniteds identify as, in Genesis 2:20, Adam was given a special charter to develop Hebrew names for the animals. I ask you in my own name, and on behalf of my fellow US citizens and mankind of all religious traditions, Abramic or otherwise, for a special charter from Congress to rename the most important currency in the world in a pluralistic manner through an open contest of ideas, starting with our own, the US Dollar, for the purpose of preserving and sanctifying life, liberty and the pursuit of happiness through wiser worldwide commercial intercourse. Doing so will help bring us closer to that day when we will all experience calm and confidence forever.

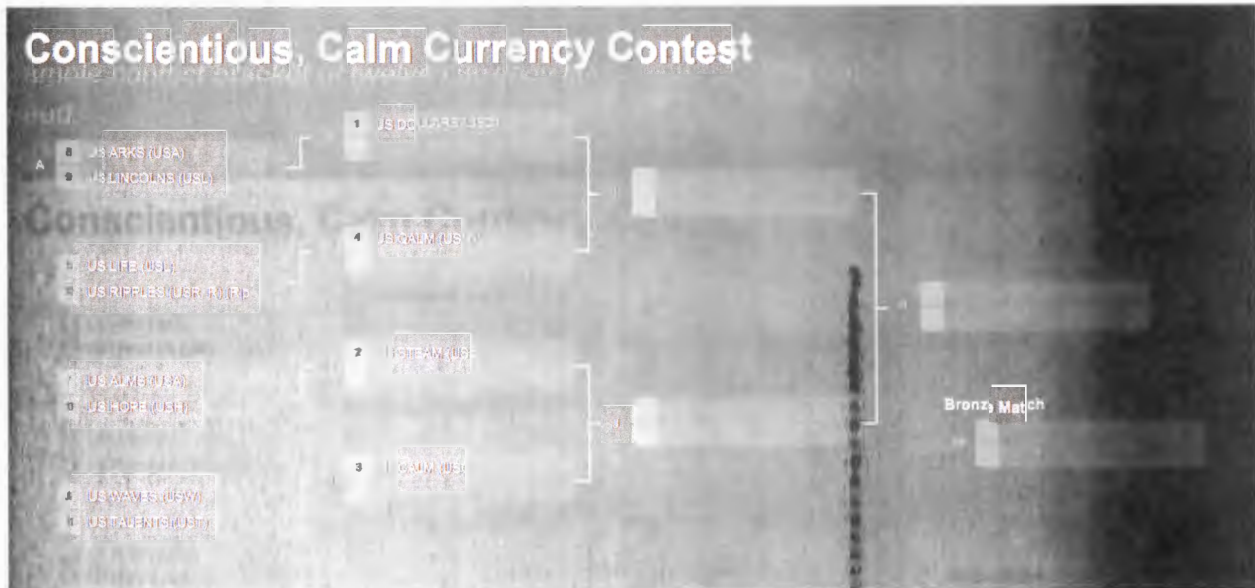
Thank you, sincerely for taking the time to read this proposal deeply. A wide range of possibilities were introduced in this paper: a US Cultural Capital Currency Competition (USC) in the form of periodic quarter century or half century currency re:naming tournaments, life-centered and liberty-focused currency names, emergent domestic and international security policies built from the USC, sociolinguistic predictions for renamed currency idioms, touch-sensitive interactive currency symbols, an extension of the notion of voting rights to Consumer Voting Days, interlinkage of State and Federal Voting Days with Consumer Voting Days for enhanced consumer feedback and civic participation, and quite a few enmeshed domestic and foreign policies fueled by our selected currency names to broker a just and lasting global peace.

It's my belief that this project of renaming our currency will have broad and long-lasting implications in national and international security and peacekeeping, and your contribution to the project may one day lead to a Peace Prize for the government agents and officials who successfully secure passage for an Act authorizing a Cyclic Calm Currency Naming Contest. If we choose well and wisely in a naming tournament with a suitable choice architecture geared toward domestic tranquility and international peace, no other currency will compare, or be as CALMing for LIFE.

Please feel free to email us ([contest@currencycalm.org](mailto:contest@currencycalm.org)) for follow-up conversation, questions, comments, criticism or planning. We would welcome any help or support you can offer.

## Appendix One

Sample contest bracket of twelve currency titles, with "US DOLLARS" promoted by default to 1st Seed.



### Sample 12 Entrant Tournament Field

Strongest Entrant Tournament Field, Ordered by Seed Status

- Seed 1: US DOLLARS (USD, D2 = 2 Dollars)
- Seed 2: US TEAM (UST, T2 = 2 \$TEAM)
- Seed 3: US CALM (USC, D2 = 2 CALM)
- Seed 4: US QALM (USQ, R2 = 2 QALM)
- Seed 5: US LIFE (USL, L✓ = 2 LIFE)
- Seed 6: US WAVES (USW, W2 = 2 WAVES)
- Seed 7: US ALMS (USA, A2 = 2 ALMS)
- Seed 8: US RIPPLES (USR, R2 = 2 RIPPLES™)
- Seed 9: US LINCOLNS (USL, L✓2 = 2 LIFE)
- Seed 10: US HOPE (USH, H)
- Seed 11: US TALENTS (UST, T)
- Seed 12: US RIPPLES (USR, R) (\*™, Ripple Labs)

## Appendix Two

A much wider pool of thirty-six (36) currency name options selected over the course of a year as sample entrants for the "First Round Draft", cultural "systempunkts for good" that may counter crime and lead, on margin, to peace and prosperity through increasingly empathic local and global trade. Some of the options below are weak, such as "US Thoughts". Some others are subtle, supple, and strong, like "US LIFE" "US CALM" and "US STEAM". It is my greatest wish to see our Congress and the Public develop and advance original names in competition that outperform those suggested below. Please read this list to "rev up" your imagination, and please do everything possible to imagine and propose your own alternative.

- ✓ ALLIES (USA)
- ✓ ALM (USA) [ALTARED LIFE MONTH FAMILY]
- ✓ CALM (USC) [ALTERED LIFE MONTH FAMILY]
- ✓ CHOICES (USC)
- ✓ CLAIMS (USC)
- ✓ DEEDS (USD)
- ✓ DOLLARS (USD)
- ✓ LABOR (USL)
- ✓ LIFE (USL)
- ✓ LIGHT (USL)
- ✓ LINCOLNS (USL)
- ✓ MARKS (USM)
- ✓ OPTIONS (USO)
- ✓ PATHS (USP)
- ✓ PEACE (USP)
- ✓ PICKS (USP)
- ✓ PLOWSHARES (USP)
- ✓ POINTS (USP)
- ✓ PREFS (USP)
- ✓ PURSUITS (USP)
- ✓ QALM (USQ) [ADJUSTED LIFE MONTH FAMILY]
- ✓ QALY (USQ)
- ✓ RATIONS (USR)
- ✓ RIPPLES<sup>TM</sup> MAYBE (RPL)
- ✓ SEEDS (USS)
- ✓ STARS (USS)
- ✓ STEM (USS)
- ✓ STEAM (USS)
- ✓ SPRINGS (USS)
- ✓ TALENTS (UST)
- ✓ THOUGHTS (UST)
- ✓ TRUST (UST)

- ✓ VOICE (USV)
- ✓ VOTES (USV)
- ✓ WAMPUM (USW)
- ✓ WAVES (USW)

**Four other example options with historical cultural value that weigh in at over two syllables and would require an exemption waiver on the syllable limit**

- ✓ The CONTINENTAL (USC) [Perhaps abbreviated in slang as “Counts”]
- ✓ The LIBERTY (USL) [Abbreviated as “Ls” with special two-syllable exemption]
- ✓ The LLP (USL) (“Life, Liberty, and the Pursuit of Happiness”)
- ✓ PROVIDENCE POINTS (USP) [Abbreviated in slang to “USP” or “Points”]

## Appendix Three: Sample Tournament Schedule

### Basic Proposed Schedule for Mutual Congress, Treasury and Agency Coordination

Contest Formally Opens	Nominations Due	Tourney Contest Finals	Public Release	1776 Anniversary
July 5, 02024 <sup>5</sup> CE <sup>6</sup>	January 1, 02025	July 4, 02025	July 4, 02026	250 <sup>th</sup>
July 5, 02074	January 1, 02075	July 4, 02075	July 4, 02076	300 <sup>th</sup>
July 5, 02124	January 1, 02125	July 4, 02125	July 4, 02126	350 <sup>th</sup>

<sup>5</sup> All dates are expressed in five digits, following The Long Now Foundation convention.

<sup>6</sup> All dates are expressed in CE, understood as Common or Current Era, to comply with the 1st Amendment's Establishment Clause

## Appendix Four: A Linguistic Litmus Test

*Please fill in the blank with your own suggested currency name to see how it might perform in everything from regular speech to slang. Replace the word "dollars" with your suggested currency name in any of the eighteen (18) sample questions below and see how your suggestion scores. For example, "LIFE", "CALM", "QALM" (pronunciation: CALM), "ALM", "WAVE", and "RIPPLE" all pass a large number of the test phrases below, meet the basic conditions ( $\leq 2$  syllables,  $\leq 8$  letters) and are highly competitive, each producing subtle and distinctive marginal effects on life through improved embedded marginal decision-making heuristics.*

1. I would sell the shirt off my back for \_\_\_\_\_ (CALM/STEAM/LIFE/DOLLARS).
2. The liquid assets of the Bill & Melinda Gates Foundation are over 37 billion \_\_\_\_\_ (dollars).
3. I scored 10 out of 10 \_\_\_\_\_ (✓ C ✓ /\$TEAM/Q ✓ /L ✓ /D) on my last quiz!
4. Our measurement of Gross National \_\_\_\_\_ (CALM/STEAM/LIFE/DOLLARS) is taken annually.
5. The President reports on the state of \_\_\_\_\_ (CALM/STEAM/LIFE/DOLLARS) as part of the State of the Union.
6. Paying my bills and debts on-time or even early helps settle the flow of \_\_\_\_\_ (CALM/STEAM/LIFE/DOLLARS).
7. A basic financial education in high school is essential for managing \_\_\_\_\_ (CALM/STEAM/LIFE/DOLLARS).
8. We can rectify and prevent the recurrence of the atrocities of the past by conducting our trades in a manner that is consistent with \_\_\_\_\_ (CALM/STEAM/LIFE/DOLLARS).
9. It's worth spending \_\_\_\_\_ (CALM/STEAM/LIFE/DOLLARS) on quality.
10. I would feel deeply ashamed—whether or not I was ever caught—if I were to counterfeit, steal or set fire to \_\_\_\_\_ (CALM/STEAM/LIFE/DOLLARS).
11. Stealing \_\_\_\_\_ (CALM/STEAM/LIFE/DOLLARS) from banks is not a victimless crime
12. Terrorists would find it hard to recruit support for an attack on an economy whose currency is denoted in \_\_\_\_\_ (CALM/STEAM/LIFE/DOLLARS).
13. A rejection of the \_\_\_\_\_ (CALM/STEAM/LIFE/DOLLARS) currency would be a rejection of life itself.
14. \_\_\_\_\_ can buy you happiness (at least, up to a point).
15. We spend so much of our lives chasing the Almighty \_\_\_\_\_ (CALM/STEAM/LIFE/DOLLARS).
16. Our currency, denominated in \_\_\_\_\_ (CALM/STEAM/LIFE/DOLLARS), ties into our international priorities
17. The interest and principal that we owe on a bank loan is better denominated in terms of \_\_\_\_\_ we borrowed \_\_\_\_\_ from our future selves, and will gladly pay it back on-time

18. Naming our currency \_\_\_\_\_ will preserve international \_\_\_\_\_ and save \_\_\_\_\_,  
and I would gladly devote the remainder of my life to securing \_\_\_\_\_.

## Appendix Five: Name Nominators & Key Legislative, Executive Personnel

### Specially Authorized Categories of Nominators (Proposed Candidate Set, Unranked)

- United States Congress: Senators and Representatives, including Speaker of the House and President of the Senate
- POTUS and FLOTUS and Family (Renegade, Renaissance, Radiance and Rosebud)
- VPOTUS and Family
- Justices of the Supreme Court of the United States
- All State Legislatures, the District of Columbia and US Territories
- State-level Departments of Education, for Students in Each State & Territory
- US Secret Service (Security and Anti-Counterfeit Mission)
- Presidential Cabinet Members (Secretaries of the Department of State, Treasury, Defense, Attorney General, Interior, Agriculture, Commerce, Labor, Health & Human Services, Housing & Urban Development, Transportation, Energy, Education, Veterans Affairs, Homeland Security)
- Governors of the Federal Reserve
- Fraternal Order of the Police, National Sheriffs' Association and the International Chiefs of Police
- State Departments of Education, selecting from Certified School Principal and College/University President Nominations, made on behalf of Faculty Selection Committees
- Heads of State with Formal United States Trading Relations, including United Nations General Assembly Members, WTO Members with Most Favored Nation Trading Status, etc.
- Countries with dollar-denominated Currencies (Canada, Australia, New Zealand, etc.)
- "We the People" Petitions from US Citizens and Resident Aliens that cross the Signature Thresholds (currently 100,000 signature in 30 days)

### Members of the United States Senate (Counterparts)

Senators Jeff Merkley (Chairman), Jon Tester, Mark R. Warner, Kay R. Hagan, Joe Manchin III, Heidi Heitkamp, Dean Heller (Ranking Member), Tom Coburn, David Vitter, Mike Johanns, Mike Crapo, Tim Johnson

### Members of the United States House of Representatives (Counterparts)

Representatives Bill Huelskamp (Chairman), Frank D. Lucas, Stevan Pearce, Bill Posey, Stephen Lee Fincher, Marlin A. Stutzman, Mick Mulvaney, Robert Pittenger, Tom Cotton, Luke Messer, Jeb Hensarling (Ex officio), Spencer Bachus (Emeritus), Wm. Lacy Clay (Ranking Member),

Gary C. Peters, Bill Foster, John C. Carney, Jr., James A. Himes, Terri A. Sewell, Patrick Murphy, Kyrsten Sinema, Denny Heck, Maxine Waters (Ex officio)

Secretary of the Treasury

Jack Lew

Governors and Presidents of the Federal Reserve Bank

Governors: Drs. Janet Yellen, Stanley Fischer, Daniel K. Tarullo, Jerome H. Powell, and Lael Brainard

Presidents: Eric S. Rosengren, William C. Dudley, Charles I. Plosser, Loretta J. Mester, Jeffrey M. Lacker, Dennis P. Lockhart, Charles L. Evans, James Bullard, Narayana Kocherlakota, Esther L. George, Richard W. Fisher, and John C. Williams



July 4th, 2016 — July 4th, 2026

Q: Which is the most life-saving and effective currency name?

<http://www.currencycalm.org>  
[contest@currencycalm.org](mailto:contest@currencycalm.org)

**APPENDIX N: "Bail Reform and Public Safety: Evidence from 33 Cities."**

**Brennan Center for Justice. August 15, 2024**

# Bail Reform and Public Safety

Evidence from 33 Cities

By Terry-Ann Craigie and Ames Grawert

AUGUST 15, 2024

**M**ore than a dozen jurisdictions across the country have curtailed the use of money bail over the past decade.<sup>1</sup> But after violent crime rose sharply in the first year of the Covid-19 pandemic, many politicians, police leaders, and pundits were quick to blame bail reform.<sup>2</sup> Claims that bail reform undermines public safety ultimately led to a series of rollbacks.<sup>3</sup> In this study, we test those claims, evaluating how crime trends fared after the enactment of bail reform policies in cities across the country.

To date, researchers have evaluated bail reform largely in individual cities or states, finding little if any evidence that these policies increased crime.<sup>4</sup> This study is the first to use data from dozens of jurisdictions nationwide to test bail reform's causal impact on crime trends. It compares major offenses from 2015 through 2021 in 22 cities that had in place some type of bail reform with 11 others that did not. The analysis first focuses on all major offenses across jurisdictions and then on specific types of crime. It also examines the impact of reforms according to whether they were implemented through legislation, court order, or changes in prosecutorial policy. Last, this study focuses on cities where research shows reforms had large effects on how and when bail was set.

Ultimately this report finds no statistically significant relationship between bail reform and crime rates. In other words, there is no reason to believe that bail reform has led

to increased crime. This holds true even when focusing on major policy changes that have drawn public scrutiny, like those in New York and New Jersey. These findings add to a growing body of literature showing that bail reform is an unlikely explanation for recent trends in crime, whether increases or decreases. And they suggest that policymakers' recent focus on weakening bail reforms as a response to crime has been misguided — and a distraction from smarter and more promising ways to enhance public safety.

## Bail Reform and Recent Crime Trends

People who have been arrested for a crime are presumed legally innocent until proven guilty. But they may nevertheless be incarcerated while awaiting trial. One common way they can gain release during this pretrial period is through money bail: a pledge of cash or a bond forfeited if they break the conditions under which they have been released. (Common conditions include limitations on travel or on contact with people involved in the case, or a requirement to meet with a pretrial services agency.)<sup>5</sup> A judge sets the amount of money that a defendant must post. Those who cannot meet this requirement are detained until their case is resolved.<sup>6</sup>

The purpose of bail, for much of the nation's history, was to guarantee a person's return to court, and it could be imposed only for that purpose.<sup>7</sup> Over the past half century, however, most states have given judges the discretion to set bail if they believe the defendant poses a safety risk to the community, regardless of whether there is a flight risk.<sup>8</sup> This shift undermines the presumption of innocence, in theory and in practice. Worse, money bail effectively makes release hinge on access to money or credit rather than public safety.<sup>9</sup>

Efforts to move away from money bail have picked up pace in the past decade. In some cases, they have grown from endeavors to address racial and economic disparities. In others, they have stemmed from a need to shrink jail populations and correctional costs or from a concern that making release contingent on money can distort decisions about release and actually undermine public safety.<sup>10</sup> In response, some jurisdictions have precluded judges from setting money bail in cases involving lower-level offenses such as violations or misdemeanors. Others have sought to constrain or inform judicial decisions by tying bail eligibility to defendants' assessed risk of flight or of committing a new offense. And several now require judges setting bail to consider a person's ability to pay.<sup>11</sup>

A variety of officeholders have led these reforms. In Illinois, New Jersey, and Utah, legislators revised the laws governing how judges can set money bail. In other states, judges and prosecutors worked within existing laws and adopted changes to bail practices. For instance, several years before the New York State legislature enacted a comprehensive reform, the Brooklyn and Manhattan district attorneys directed prosecutors not to seek bail in some lower-level cases.<sup>12</sup> Finally, in some jurisdictions, including the state of California and Harris County, Texas, courts imposed changes to bail policy.<sup>13</sup> Maryland's high court issued guidance requiring judges to assess a defendant's ability to pay before setting bail.<sup>14</sup> Some of these measures proceeded on a bipartisan basis. Bail reform in Alaska, New Jersey, and Utah was championed by Republican governors.<sup>15</sup>

But after violent crime rose sharply across the country during the first year of the Covid-19 pandemic, the politics of bail reform changed. Nationally, the murder rate climbed by 30 percent from 2019 to 2020 and the assault rate rose by 10 percent. Cities that track gun violence also reported spikes in shootings.<sup>16</sup> In the years since the onset of the pandemic, some cities also saw increases in retail theft.<sup>17</sup> In the absence of reliable data, many politicians and pundits attributed the upticks to bail reform, a narrative that only intensified in the 2022 midterm elections.<sup>18</sup> Ultimately, concerns about rising crime drove a broad political reaction against criminal justice reform in general and bail reform in particular. Several states rolled back previous reforms, and some prosecutors who had implemented their own policy changes came under criticism.<sup>19</sup>

Four years later, researchers have begun to offer possible explanations for the violent crime spike. Bail reform is not among them.<sup>20</sup> While no single factor can explain crime trends, the best evidence points to the social disruption caused by the pandemic, which had profound effects on mental and community health, as well as an increase in people buying, carrying, and using firearms. Budget cuts in 2020 also forced local governments to cut back services that promote safety, such as violence-prevention initiatives and after-school programs, and to close places where people can safely congregate.<sup>21</sup> But the narrative around bail reform persists, driving pushback to criminal justice reforms and contributing to misleading claims about crime across the country.<sup>22</sup> It is vitally important that policymakers and voters have the best possible evidence at hand when evaluating these claims.

## Research Strategy

We are aware of no prior study that evaluates the causal relationship between bail reform and crime rates at the national level.<sup>23</sup> The best causal research to date focuses instead on individual jurisdictions and suggests that reforms have caused little if any increase in crime or pretrial rearrest rates. These findings hold even in jurisdictions that have made major changes to their policies relating to money bail.<sup>24</sup>

To supplement these studies, we examined the impact of bail reforms across multiple jurisdictions, which minimizes the risk that any observed change in crime rates might be due to factors that are strictly local or fleeting. This approach also enables us to consider different varieties of bail reform.

## Data Collection and Classification

For this analysis, we constructed a proprietary database of monthly crime data from 2015 through 2021 in 33 cities.<sup>25</sup> We selected cities first on the basis of data availability and then added other jurisdictions to ensure that all regions of the country were represented and that major recent policy changes were included.<sup>26</sup> From these cities we collected data on six of the eight crimes defined by the FBI as Part I index offenses: murder, robbery, aggravated assault, burglary, motor vehicle theft, and larceny.<sup>27</sup> Because these are some of the most serious offenses, almost all police agencies track them. (Lower-level offenses such as harassment are not consistently tracked across cities.) These offenses are also clearly defined in FBI crime-reporting documentation, providing a baseline that can help overcome city-to-city differences in how offenses are labeled.<sup>28</sup>

Guided by the FBI's classifications, we then split these crimes into three categories: index crime (all six offenses), violent crime (murder, robbery, and aggravated assault), and property crime (burglary, motor vehicle theft, and larceny). We also studied larceny separately, as it is the FBI index offense most likely to include and track trends in lower-level (misdemeanor) crime.<sup>29</sup>

We defined *bail reform* broadly as any policy designed to limit the scope or impact of money bail, regardless of how the policy was implemented, and surveyed cities to identify any policy change enacted during the study period that met this definition.

Table 1 provides a summary of bail reform policies evaluated in this report, noting how they came about and what they sought to achieve.<sup>30</sup>

We classified jurisdictions with bail reforms in two ways, first according to the entity that implemented the reform: prosecutor, court, or legislature. This division was intended to capture some of the variation among reforms. (Legislative reforms tend to be more sweeping than prosecutorial ones, for example.) Where jurisdictions experienced multiple policy changes during the study period, this analysis focused on the earliest to take effect. Thus, Los Angeles became a bail reform jurisdiction in December 2020, based on prosecutor-led reforms, rather than in March 2021, when the case *In re Humphrey* required judges to make ability-to-pay determinations when setting bail.<sup>31</sup> The sole exception was New York City. Though Brooklyn and Manhattan prosecutors changed their bail practices in 2017 and 2018, respectively, these reforms were not adopted citywide. Focusing on either date would also understate the impact of the much broader statewide reform enacted in 2020.

We then created a second classification based on the outcomes of reforms. Some changes in bail policy have been shown to have far-ranging effects on the percentage of cases in which bail is imposed or the percentage of defendants who are released while awaiting trial. For example, Harris County (including Houston) sharply reduced pretrial detention for people charged with misdemeanors.<sup>32</sup> Other changes have not had such an impact: for instance, Philadelphia has not seen a pronounced effect on pretrial detention outcomes.<sup>33</sup> Grouping reforms that have substantially affected bail outcomes with those that have not would risk obscuring any impact that broader or more successful reforms have had on crime trends. Therefore, we created a subsample of cities with sweeping reforms where research also showed changes in how and when bail is imposed: Buffalo, New York; Chicago; Houston; Newark, New Jersey; and New York City.<sup>34</sup>

## Descriptive Statistics

Figure 1 draws on FBI data to illustrate crime trends in cities with bail reform and in those without, from the beginning

of our study period, 2015, through the year after it, 2022. As the graphs show, the groups broadly mirror each other: crime dropped in 2020 — when property crime, by far the most common type of offense, plummeted amid the pandemic — and then rose in subsequent years. Notably, the average violent crime rates of cities with bail reform held largely steady during the Covid-19 pandemic and remained lower in its aftermath than the average for cities without reform. (Both groups of cities, however, saw a spike in murders between 2019 and 2021. That trend is not visible in these graphs since murder is the rarest violent crime.)

These trends call into question any theory that posits a relationship between bail reform and crime. But while these graphs may be instructive, they can only show correlations (or lack thereof). Assessing whether a causal relationship exists requires a more sophisticated analysis.

## Difference-in-Differences Regression Strategy

To test the causal impact of bail policies on crime outcomes, we used a difference-in-differences estimation strategy, comparing the trajectories of crime rates in cities that adopted bail reform with those in cities that did not.<sup>35</sup>

Simple difference-in-differences estimation strategies do not account for a crucial characteristic of the dataset analyzed in this report. Bail reform policies were implemented at different times: in New Jersey in 2017, for example, and in New York in 2020. This staggered implementation creates a risk that cities with earlier reforms would be given undue weight in a basic regression model. For this report, then, we used a new estimator that is designed to account for staggered policy adoption.<sup>36</sup>

Control variables, including those tracking basic socioeconomic factors, political orientation, and Covid-19 shutdown dates and length, were also applied.<sup>37</sup> While it would be ideal to also control for decline-to-prosecute policies, which could affect criminal justice case processing, these policies tended to be implemented alongside bail reform and therefore could not be controlled for.<sup>38</sup>

To confidently establish a causal relationship between bail reform and crime rates in our data, two conditions must be met. First, crime trends prior to reform in these cities must match those in cities that did not implement reforms, such that comparing pre-reform and post-reform trends is likely to reflect the impact of the policy change in question — here, bail reform (this is known as the parallel trends assumption). Otherwise, any divergences post-reform could be the result of underlying pre-reform differences rather than the policy change. We tested for significant differences in pre-reform trends, and our models passed these tests in all but a few cases.<sup>39</sup> Overall,

TABLE 1

**Bail Reform Policies in Effect, 2015–2021**

CITY	LED BY	EFFECTIVE	EFFECT
Atlanta, GA	Legislature	July 2018	Circumscribes judicial discretion in misdemeanor cases and requires the consideration of ability to pay money bail in all cases.
Austin, TX	Courts	February 2020	Expands use of unsecured personal recognizance bonds to cover most nonviolent misdemeanors.
Austin, TX	Prosecutor	April 2021	Directs prosecutors, depending on the severity of the charges, to seek release presumptively with no conditions or the “least restrictive condition necessary” to mitigate risk of flight or threat to public safety.
Baltimore, MD	Courts	July 2017	Prioritizes releasing defendants on personal recognizance or under the least restrictive conditions.
Boston, MA	Prosecutor	March 2019	Required presumptive release for some offenses and least restrictive conditions in more serious offenses if the presumption was rebutted.
Buffalo, NY	Legislature	January 2020	Ends money bail and requires release or nonmonetary conditions for lower-level nonviolent offenses. In other cases, judges must set the least restrictive conditions that “will reasonably assure” return to court.
Chicago, IL	Prosecutor	March 2017	Recommends personal recognizance bonds for misdemeanors and low-level offenses when no risk factors suggest danger to community or flight risk.
Chicago, IL	Courts	September 2017	Creates presumption against monetary conditions, requires the “least restrictive” conditions to ensure return to court, and sets procedures for mandatory ability-to-pay determinations.
Chicago, IL	Legislature	January 2018	Requires the least restrictive release conditions and obligates courts to “consider the defendant’s socioeconomic circumstances”.
Cincinnati, OH	Courts	July 2020	Absent a granted motion for pretrial detention, required courts to release a defendant on the least restrictive conditions. Money bail had to be the least burdensome necessary to “reasonably assure” return to court.
Colorado Springs, CO	Legislature	April 2019	Removes authority to set money bail for lowest-level misdemeanors and violations and traffic infractions.
Dallas, TX	Prosecutor	April 2019	Specifies that prosecutors will presumptively agree to release without conditions in misdemeanors and in cases involving lower-level felonies when the defendant has no recent conviction record. For all other felonies, prosecutors will seek the least restrictive conditions.
Denver, CO	Legislature	April 2019	Removes authority to set money bail for lowest-level misdemeanors and violations and traffic infractions.
Houston, TX	Courts	June 2017	Removes authority for courts to set money bail in most misdemeanor cases.
Kansas City, MO	Courts	July 2019	Requires courts to impose the least restrictive conditions and to impose monetary conditions only when nothing else will secure the appearance of the defendant at trial or the safety of the community, and authorizes ability-to-pay determinations.

(continued on next page)

**TABLE 1** (continued from previous page)**Bail Reform Policies in Effect, 2015–2021**

CITY	LED BY	EFFECTIVE	EFFECT
Los Angeles, CA	Legislature	January 2017	Permits pretrial detention and monetary bail only when no other combination of nonmonetary conditions will suffice, as determined by a risk assessment.
Los Angeles, CA	Prosecutor	December 2020	Adopts a presumption of release for prosecutors in all cases, precludes cash bail for misdemeanors and lower-level felonies, and obligates prosecutors to seek only bail “aligned with” the defendant’s ability to pay.
Los Angeles, CA	Courts	March 2021	Requires determination of ability to pay in all cases.
Louisville, KY	Legislature	June 2011	Effectively abolished commercial bail (1976) and requires release of people evaluated as posing a low or moderate risk of flight or to the community (2011).
Newark, NJ	Legislature	January 2017	Largely limits money bail and replaces it with a system that ties detention to a defendant’s risk of flight or of committing an offense while released, with decisions guided by a risk assessment tool.
New York, NY	Legislature	January 2020	Ends money bail and requires release or nonmonetary conditions for lower-level nonviolent offenses. In other cases, judges must set the least restrictive conditions that “will reasonably assure” return to court.
Philadelphia, PA	Prosecutor	February 18	Ends prosecutors’ practice of seeking money bail for most low-level offenses. In March 2020, District Attorney Larry Krasner also announced that prosecutors would seek high bail or detention only “for those who cannot be released without posing a serious threat to public safety.”
Sacramento, CA	Courts	March 2021	Requires determination of ability to pay in all cases.
San Francisco, CA	Courts	July 2019	Requires courts to impose the least restrictive conditions and to impose monetary conditions only when nothing else will secure the appearance of the defendant at trial or the safety of the community, and authorizes ability-to-pay determinations.
San Francisco, CA	Prosecutor	January 2020	Ended prosecutors’ practice of seeking money bail, and of seeking pretrial detention except in enumerated circumstances.
San Francisco, CA	Courts	March 2021	Requires determination of ability to pay in all cases.
St. Louis, MO	Prosecutor	January 2017	Limited money bail requests to more serious felonies.
Virginia Beach, VA	Legislature	July 2021	Eliminates presumption of detention for certain serious charges.
Washington, DC	Legislature	July 1992	Sets a presumption of release; obligates judges to impose the least restrictive conditions that will ensure the defendant’s return to court and community safety; and permits only unsecured bail bonds, and only when necessary to prevent flight, effectively abolishing money bail.

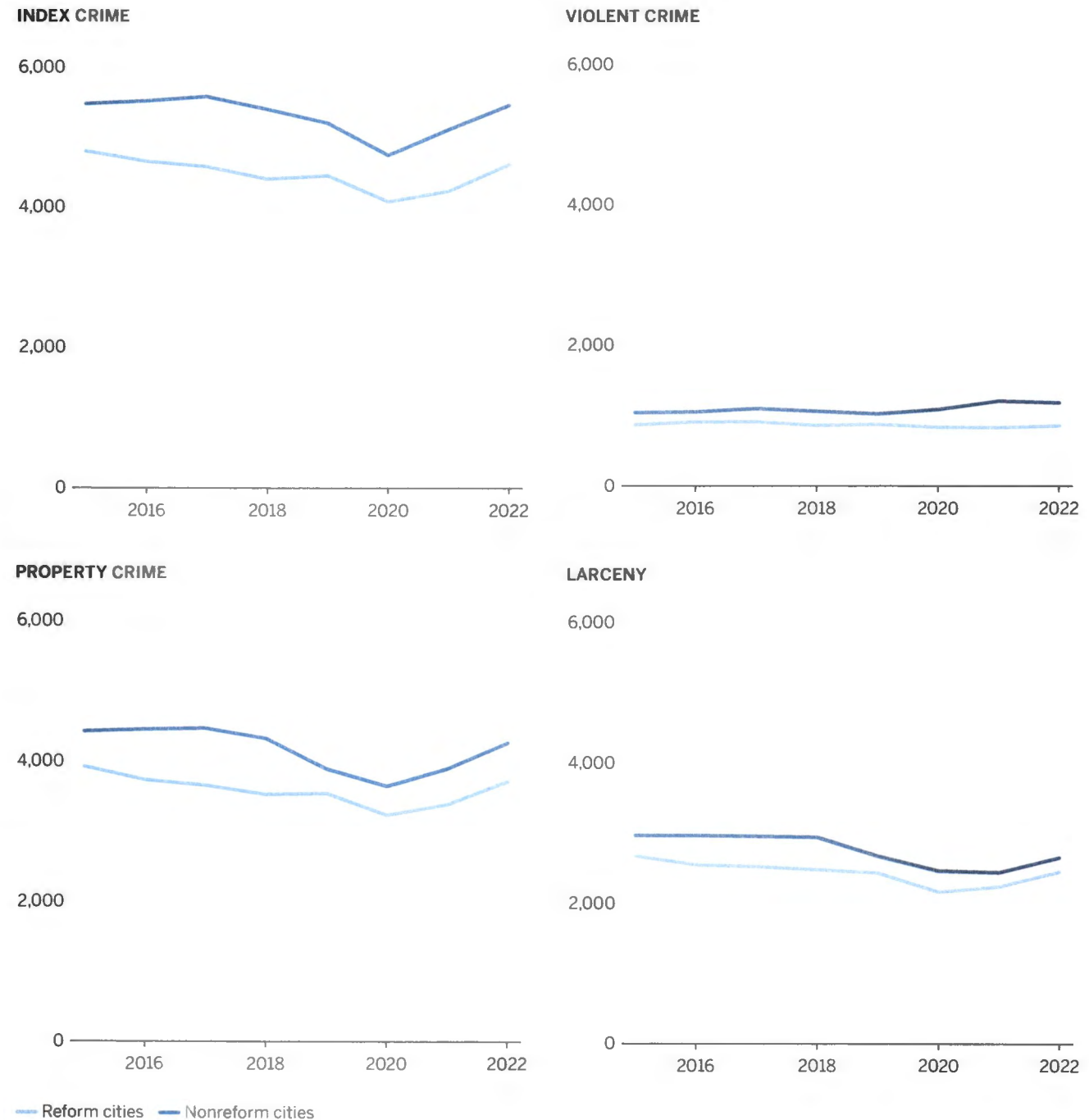
**Note:** Gray shading indicates initiatives that were later ended or significantly pared back, for example by repeal or following the election of a new chief prosecutor.

**Source:** Brennan Center analysis. See appendix A

**FIGURE 1**

## Average Crime Rates of Cities by Reform Status, 2015–2022

PER 100,000 PEOPLE



**Note:** Graphs illustrate the average of city crime rates for the 22 jurisdictions studied in this report that adopted bail reform before or within the study period and the 11 that did not. Cities that did not report a full year of data are excluded from the average for that year. Due to a transition in the FBI's data reporting system, 11 cities failed to report data in 2021, rendering that year's data point less reliable than those for other years.

**Source:** Federal Bureau of Investigation, Uniform Crime Reports, 2015–2022.

the cities in this study represent a good sample of reform and nonreform jurisdictions that have sufficiently similar crime trends.

Second, in assessing causal claims, we need to consider the statistical significance of any estimated differences in crime trends found following bail reform. We should expect small variations between cities. What matters is whether any divergence in crime rates is statistically significant — that is, whether we would be likely to see a difference as large due to random chance. Ultimately, our results reveal that there are no statistically significant differences in crime rates that can be attributed to bail reform.

## Findings

First, we sought to answer the most basic question posed by this study: did reforms implemented in U.S. cities during the study period affect crime trends? This question offers the broadest look at the effects of bail reform on crime rates.

To answer this question, we analyzed data from all cities studied in this report and all types of bail reform policies to test the effect of bail reform on crime generally — that is, the combination of all six offenses studied in this report. This model showed no statistically significant difference in crime rates after reform. In other words, we found no evidence that bail reform affected crime rates.

Figure 2 presents our findings from the full sample of cities: specifically, how index crime rates — here, the sum

of the murder, robbery, aggravated assault, burglary, motor vehicle theft, and larceny rates — differed between cities with and without reform. The graph tracks crime rates from 6 months before reform to 12 months after reform.

As the graph illustrates, index crime remained largely stable after reform implementation. The black line represents the best estimate of the difference in crime rates between cities that adopted bail reform and those that did not. A positive value at a given time point indicates that the crime rate was higher in cities that had instituted bail reform than in those that had not; a negative value indicates crime was lower in cities with reform than in those without it.

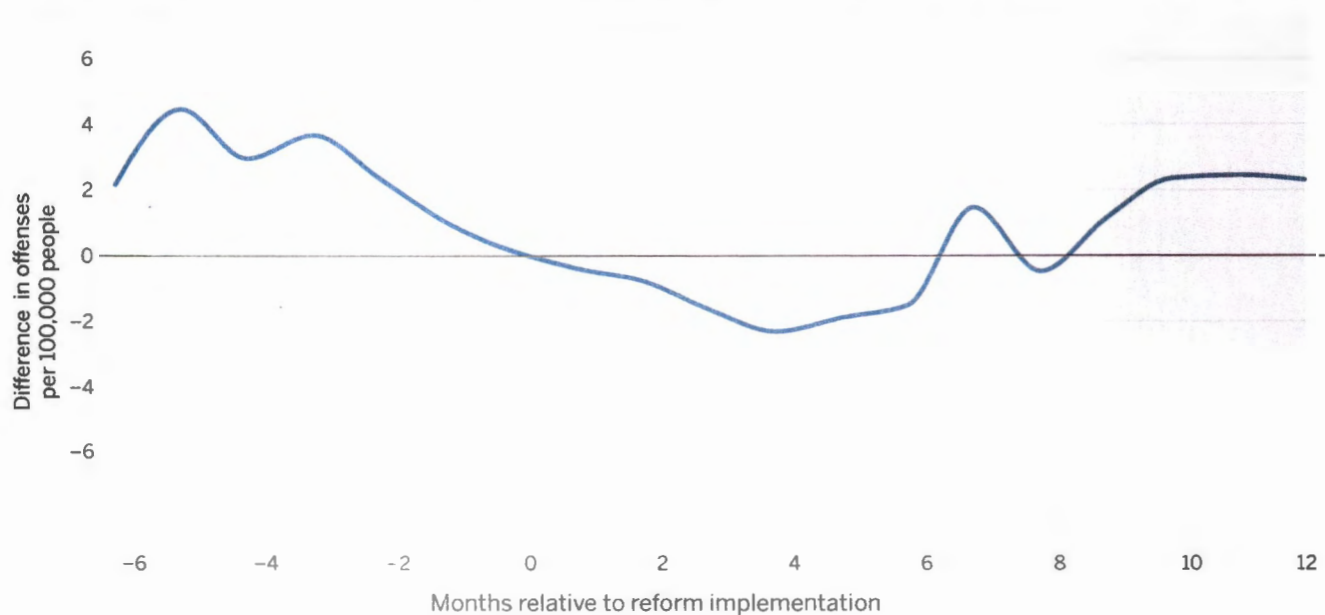
For example, the figure indicates that, seven months after a city in our sample instituted bail reform, crime was likely slightly higher than in an otherwise comparable city without reform. Similarly, eight months after the implementation of bail reform, crime was likely slightly lower.

But these estimates carry a great deal of uncertainty. The gray area expresses that uncertainty, representing the confidence interval: the range of values that may also reflect the difference in index crime rates. The confidence interval crosses the x-axis at all times after the adoption of bail reform, meaning that the difference in crime rates between cities with and without bail reform could have been zero at all times. Put simply, there is no statistically significant difference in crime rates between cities that reformed their bail policies and those that did not.

We then used this broad sample to test how bail reform might impact different types of crimes. Theoretically, bail

**FIGURE 2**

### Difference in Index Crime Rates Between Cities With and Without Bail Reform



Source: Brennan Center analysis.

reform could affect one crime type but not another. Neither violent crime (murder, assault, and robbery) nor property crime (larceny, burglary, and motor vehicle theft) showed a statistically significant relationship with bail reform (see table 2).<sup>40</sup>

We also investigated whether bail reform affected larceny rates in particular. Larceny is the only crime in this report's dataset that could encompass some misdemeanor offenses. Therefore, this analysis might identify whether bail reform caused increases or decreases in misdemeanors. But again, no such evidence emerged.

Bail decisions are shaped by three entities: legislators, who define the limits of judicial discretion; prosecutors, who decide whether to seek bail; and judges, who set bail. Reforms adopted by these actors may differ and have a smaller or larger effect on crime rates. Similarly, if there is a relationship between bail reform and crime rates, then that effect would be most pronounced in cities with bolder reforms that substantially reshape bail policy.

To test these theories, we analyzed the effects of reforms based on whether they were implemented by legislators, courts, or prosecutors. We compared the cities that followed a particular path toward bail reform with the cities that had not implemented any reform. For example, cities with prosecutor-led reforms were compared with control cities with no reforms, while cities

with legislative or court-led reforms were dropped from the sample.<sup>41</sup>

For all types of reform, we found no statistically significant difference in post-reform crime trends. These results held when evaluating their effect on rates of crime generally, as well as on property crime, violent crime, and larceny.

We then assessed the cities — Buffalo, Chicago, Houston, Newark, and New York City — where reforms had the largest impact on how and when bail was set. We compared crime trends in these five cities against cities that had not enacted bail reform and dropped the other cities that had implemented reforms from the sample. Once again, no statistically significant effects emerged.

## Statistical Checks

We conducted several additional statistical tests to ensure the validity of these results. First, we considered the possibility that any single jurisdiction might, on its own, skew the crime rates of the group. To test this possibility, we reran every analysis, dropping each city and state from the dataset in succession, given that bail reform is enacted at both the city and the state level. (For example, in the state robustness test, we dropped Buffalo and New York City, the two cities in the state of New York; in the city robust-

TABLE 2

### Effect of Bail Reform Policies on Crime Rates

	ESTIMATED EFFECT MONTHLY (CRIMES PER 100,000 PEOPLE)	STATISTICAL SIGNIFICANCE	PRE-REFORM TRENDS
<b>By type of crime</b>			
Index crime	+0.01	None	Parallel
Violent crime	+0.35	None	Not parallel
Property crime	-1.05	None	Parallel
Larceny	-7.61	None	Parallel
<b>By type of reform</b>			
Legislative	-0.86	None	Parallel
Prosecutorial	-0.81	None	Parallel
Judicial	-0.32	None	Parallel
Major	-0.30	None	Parallel

**Note:** For full regression tables, see the methodological supplement. The "major" category includes five jurisdictions, three with legislative and two with court-led reforms. Values represent the estimated monthly change in crime rate.

**Source:** Brennan Center analysis.

ness test, we dropped each in succession.) Once again, the results did not show that bail reform had a statistically significant effect for any type of crime or policy.

Second, to study the effects of bail reform before the Covid-19 pandemic, we reran each analysis removing all observations after March 1, 2020. This required dropping from the analysis cities that had enacted bail reforms after that date (such as Austin and New York). No statistically significant effects were found.

## Discussion

Bail reform did not have a statistically significant effect on crime rates in any of the analyses. Further, there were no statistically significant differences in pre-reform trends between cities with and without bail reform for all except a few of our models.

As these findings show, there is no evidence that bail reform affects crime rates. This holds true even when distinguishing among various types of crime and various types of reform. These findings reinforce studies about individual jurisdictions that have found little if any relationship between bail reform and crime. They show that political attacks on bail reform lack a foundation in evidence.

Further research is needed to test other theories about how bail reform may interact with crime. For instance, it is possible that reform could lead to increases in crime that take several years to materialize. But it could also lead to long-term reductions in crime.<sup>42</sup> Misdemeanor bail reform could shift enforcement resources away from lower-level offenses and toward more serious ones. Pretrial supervision programs, which are often created or expanded alongside bail reform, could reduce pretrial rearrests if implemented with adequate funding and with an eye toward avoiding an increase in supervision of people who would previously have been released.<sup>43</sup> Bail reform could also reduce the collateral consequences of incarceration that, by preventing people from attaining

the basic necessities of life, make recidivism more likely.<sup>44</sup> These theories, which are unlikely to be observed in the relatively short period studied here, are worth testing as more data becomes available.

Separately, pretrial systems are complex, and reforms may create unintended consequences, such as expansions in supervision and increases in detention for some types of cases.<sup>45</sup> Researchers should take these possibilities into account as data on the criminal justice system improves. As more cities, counties, and states enact bail reform policies, researchers may also be able to work with more robust data.

## Conclusion

This report discredits theories linking bail reform to recent increases in crime. We find no evidence to support such a connection, even after testing different types of reform in jurisdictions across the country. This finding should not be surprising: Claims that bail reform increases crime incorrectly assume that it requires the release of people who may threaten the community. In fact, in most cases judges retain broad discretion to prioritize public safety — without the distorting influence of money.

It follows that the best explanations for the mid-pandemic spike in violent crime lie beyond bail policy, as do the best solutions to reduce violent and property crime.<sup>46</sup> Policymakers tasked with ensuring public safety should focus on addressing specific social and policy problems that worsened during the pandemic and continue to this day.<sup>47</sup> They should, for example, expand access to mental health and substance abuse treatment programs.<sup>48</sup>

Other investments can build on bail reform to lessen reliance on pretrial detention. Increased funding for supervision programs and community-based service providers, for example, would make reforms more effective and the criminal justice system more fair.<sup>49</sup> But leaders who are serious about improving public safety will need to look beyond bail policy to reduce crime and violence.

## Appendix A: Notes to Table 1

In constructing this table, the authors were guided by three previous studies that also collected state and local bail reforms. Because the authors supplemented the analysis in these reports with further research, details and effective dates may diverge between them. See Isabella Jorgensen and Sandra Susan Smith, *The Current State of Bail Reform in the United States: Results of a Landscape Analysis of Bail Reforms Across All 50 States*, Harvard Kennedy School Faculty Research Working Paper Series RWP21-033, December 2021, <https://www.hks.harvard.edu/publications/current-state-bail-reform-united-states-results-landscape-analysis-bail-reforms-across>; Don Stemen and David Olson, *Is Bail Reform Causing an Increase in Crime?*, Harry Frank Guggenheim Foundation, January 2023, <https://www.hfg.org/wp-content/uploads/2023/01/Bail-Reform-and-Crime.pdf>; and Amanda Agan, Jennifer Doleac, and Anna Harvey, *Prosecutorial Reform and Local Crime Rates*, Law & Economics Center at George Mason University Scalia Law School Research Paper Series No. 22-011, October 29, 2021, [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3952764](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3952764).

### California

*In re Humphrey*, 482 P.3d 1008 (Cal. 2021). Also see “*In re Humphrey*: California Supreme Court Holds Detention Solely Because of Inability to Pay Bail Unconstitutional,” *Harvard Law Review* 135, no. 912 (January 2022), <https://harvardlawreview.org/print/vol-135/in-re-humphrey/>. Critics argue that the “promise of *Humphrey* . . . remains unmet” because there was no evidence that pretrial jail populations, bail amounts, or average length of pretrial detention decreased in California. See Alicia Virani et al., *Coming Up Short: The Unrealized Promise of In re Humphrey*, UCLA School of Law and Berkeley Law Policy Advocacy Clinic, October 2022, [https://law.ucla.edu/sites/default/files/PDFs/Criminal\\_Justice\\_Program/Coming\\_Up\\_Short\\_Report\\_2022\\_WEB.pdf](https://law.ucla.edu/sites/default/files/PDFs/Criminal_Justice_Program/Coming_Up_Short_Report_2022_WEB.pdf).

**Los Angeles.** George Gascón, Los Angeles County District Attorney, “Special Directive 20-06,” December 7, 2020, <https://perma.cc/H9GE-RWQW>. For media coverage, see James Queally, “On First Day as L.A. County D.A., George Gascón Eliminates Bail, Remakes Sentencing Rules,” *Los Angeles Times*, December 7, 2020, <https://www.latimes.com/california/story/2020-12-07/in-first-day-on-job-gascon-remakes-bail-sentencing-rules>. The policy was reversed in May 2022 to permit prosecutors to request cash bail for people who pose an exceptional risk

to public safety, regardless of whether they are charged with a misdemeanor or felony offense; see Scott Schwebke, “Embattled DA Gascón Reverses Course on Controversial Zero-Bail Policy,” *Los Angeles Daily News*, May 13, 2022, <https://www.dailynews.com/2022/05/13/embattled-da-gascon-reverses-course-on-controversial-zero-bail-policy/> (describing how Gascón revised the policy about 17 months after taking office).

**San Francisco.** San Francisco District Attorney’s Office, “Policy Directive: 1.1 Pretrial Release Conditions and Detention Policy,” updated January 19, 2022, <https://sfdistrictattorney.org/wp-content/uploads/2022/01/1.1-Pretrial-Release-and-Detention-Policy-Updated-1.19.2022.pdf>. Also see Chesa Boudin (@chesaboudin), district attorney, City and County of San Francisco, Twitter post, January 23, 2020, <https://twitter.com/chesaboudin/status/1220229678386073601> (“To be clear, the policy we rolled out today focused on ending money bail not on promoting algorithms. You can read the policy here.”). This policy was revised in August 2022 when Brooke Jenkins replaced Boudin as district attorney and directed prosecutors to seek cash bail and pretrial detention in limited misdemeanor cases “as required by law” where “less restrictive measures have proven ineffective and pre-trial detention will improve victim and public safety.” San Francisco District Attorney’s Office, “District Attorney Brooke Jenkins Announces Pre-Trial Release and Detention Policy,” August 24, 2022, <https://www.sfdistrictattorney.org/press-release/district-attorney-brooke-jenkins-announces-pre-trial-release-and-detention-policy/>.

### Colorado

H.B. 19-1225, 72nd Gen. Assemb., Reg. Sess. § 1 (Colo. 2019), <https://leg.colorado.gov/bills/hb19-1225>, codified at Colo. Rev. Stat. Ann. § 16-4-113 (2022).

### Georgia

S.B. 407, 154th Gen. Assemb., Reg. Sess. § 2-4 (Ga. 2018), <https://www.legis.ga.gov/legislation/52661> (noting an effective date of July 1, 2018), codified at Ga. Stat. Ann. § 17-6-1(b)(1), (e)(2). But research suggests that counties are failing to consistently evaluate a person’s financial circumstances after an arrest and guarantee release within 48 hours for those who cannot pay. See Andrea Woods et al., “Boots and Bail on the Ground: Assessing the Implementation of Misdemeanor Bail Reforms in Georgia,” *Georgia Law Review* 54, no. 4 (2020): 1235, <https://georgialawreview.org/article/13665-boots-and-bail-on-the-ground-assessing-the-implementation-of-misdemeanor-bail-reforms-in-georgia>.

## Illinois

S.B. 2034, 100<sup>th</sup> Gen. Assemb., Reg. Sess. § 1-10 (Ill. 2017), <https://www.ilga.gov/legislation/BillStatus.asp?GA=101&DocTypeID=SB&DocNum=2034&GAID=14&SessionID=91&LegID=105495>, codified at 725 Ill. Comp. Stat. Ann. 5/110-1 et seq. Also see Ill. Comp. Stat. § 75/1 (providing for an effective date of January 1 of the following year for laws passed before June 1).

**Chicago.** For prosecutor-led reform, see Steve Bogira, “The Hustle of Kim Foxx,” *Marshall Project*, October 29, 2018, <https://www.themarshallproject.org/2018/10/29/the-hustle-of-kim-foxx> (“Foxx had also moved forward quickly on another front: bail reform. In March, she announced that her prosecutors would no longer oppose the granting of individual recognizance bonds, or I-bonds, to detainees charged with nonviolent crimes who currently were required to post \$1,000 or less but couldn’t afford to.”); and Steve Schmadeke, “Foxx Agrees to Release Inmates Unable to Post Bonds of Up to \$1,000 Cash,” *Chicago Tribune*, March 1, 2017, <https://www.chicagotribune.com/2017/03/01/foxx-agrees-to-release-of-inmates-unable-to-post-bonds-of-up-to-1000-cash/>. Also see Cook County State’s Attorney Office, “State’s Attorney Foxx Announces Major Bond Reform,” June 12, 2017, <https://www.cookcountystatesattorney.org/news/state-s-attorney-foxx-announces-major-bond-reform> (documenting further policy changes). For court-led reform, see Cook County Cir. Ct. G.O. 18.8A (July 17, 2017), <https://bit.ly/3U8WNPG> (archived link). The order was effective on September 17, 2017, for all felony cases, and on January 1, 2018, for all cases. Also see Don Stemen and David Olson, *Dollars and Sense in Cook County: Examining the Impact of General Order 18.8A on Felony Bond Court Decisions, Pretrial Release, and Crime*, Lovola University Chicago, Safety and Justice Challenge, 2020, 3, <https://www.safetyandjusticechallenge.org/wp-content/uploads/2020/11/Report-Dollars-and-Sense-in-Cook-County.pdf>. However, the SAFE-T Act, which effectively ended money bail in Illinois, rendered the order moot. See Stephanie Wylie and Ames Grawert, *Challenges to Advancing Bail Reform*, Brennan Center for Justice, April 2024, 12, <https://www.brennancenter.org/our-work/research-reports/challenges-advancing-bail-reform>.

## Kentucky

Ky. Rev. Stat. Ann. § 431.066 (2024). For further background, see Colin Doyle, Chiraag Bains, and Brook Hopkins, *Bail Reform: A Guide for State and Local Policymakers*, Harvard Law School Criminal Justice Program (2019), 39–42, <https://static.prisonpolicy.org/scans/Harvard%20Guide%20to%20Bail%20Reform.pdf>; and Alysia Santo, “Kentucky’s Protracted Struggle to Get Rid of Bail,” *Marshall Project*, November 12,

2015, <https://www.themarshallproject.org/2015/11/12/kentucky-s-protracted-struggle-to-get-rid-of-bail/>.

## Maryland

Md. R. 4-216.1, Pretrial Release – Standards Governing (July 1, 2017), <http://home.ubalt.edu/id86mp66/PTIC/Md.%20Rule%204-216.1.PDF>. For criticisms that the bail reform has not meaningfully reduced jail populations, has increased “no bail holds,” and hasn’t improved bail hearings in the state’s second-biggest county by population, see Color of Change, *Prince George’s County: A Study of Bail*, June 2018, [https://static.colorofchange.org/static/v3/pg\\_report.pdf](https://static.colorofchange.org/static/v3/pg_report.pdf). Another report found that the percentage of people held in Baltimore City without bonds remained steady despite arrest numbers going down during the pandemic; see Jerry Iannelli, “As Covid-19 Permeates Prisons and Jails, Baltimore Defendants Continue to Be Held Without Bail,” *Appeal*, July 14, 2020, <https://theappeal.org/baltimore-defendants-held-without-bail/>.

## Massachusetts

**Boston.** Suffolk County District Attorney’s Office, *The Rachael Rollins Policy Memo*, March 25, 2019, Appendix B, B-1–B-4, <https://files.suffolkdistrictattorney.com/The-Rachael-Rollins-Policy-Memo.pdf> (describing the office’s policy on bail, pretrial detention, and presumptive release). For concerns about effective implementation and general criticisms of the policy, see Walter Wuthmann, “Rachael Rollins, 100 Days In: What Has Changed, and What Hasn’t, Under the Reformer DA,” *WBUR*, April 12, 2019, <https://www.wbur.org/news/2019/04/12/rachael-rollins-first-100-days>.

## Missouri

Order dated June 30, 2019, clarifying orders re: Rules 21, 22 and 33, Supreme Court of Missouri (2019), <https://www.courts.mo.gov/page.jsp?id=141914>. Also see order dated December 18, 2018, re: Rules 21, 22 and 33, Supreme Court of Missouri (2018), <https://www.courts.mo.gov/page.jsp?id=134633> (enacting the reform and noting an effective date of July 1, 2019). For a commentary on the implications of the state’s bail reform for Missouri’s public defenders and indigent defendants, see Dana Kramer, “Bail Reform: A Possible Solution to Missouri’s Broken Public Defender System?,” *Missouri Law Review* 85, no. 1 (Winter 2020): 297–319, <https://scholarship.law.missouri.edu/cgi/viewcontent.cgi?article=4423&context=mlr>.

**St. Louis.** In 2017 St. Louis Circuit Attorney Kim Gardner partnered with the Vera Institute of Justice’s Reshaping Prosecution Program to collect and analyze data to guide policy development. See Ahki Johnson and Stephen

Roberts, *Reshaping Prosecution in St. Louis: Lessons from the Field*, Vera Institute of Justice, October 2020, foreword, <https://www.vera.org/downloads/publications/reshaping-prosecution-in-st-louis.pdf>. Two years later, the office formalized a policy reducing the use of cash bail. However, some policy changes had gone into effect prior to that announcement. Rachel Lippman, “Gardner Pledges More Court Diversion, Less Cash Bail,” St. Louis Public Radio, January 30, 2019, <https://news.stlpublicradio.org/government-politics-issues/2019-01-30/gardner-pledges-more-court-diversion-less-cash-bail> (referencing the use of summonses in misdemeanor cases). As a result, we treat Circuit Attorney Gardner’s inauguration as the “start” of prosecutor-led bail reform in St. Louis. Note that those efforts came to an end after the study period concluded. In May 2023, Gardner resigned “following threats from the Missouri state legislature to pass a bill stripping her office of power.” See Akela Lacy, “Why St. Louis’s Reform DA Kim Gardner Quit,” *Intercept*, May 6, 2023, <https://theintercept.com/2023/05/06/kim-gardner-st-louis-da-resigns-reform/>.

## New Jersey

P.L. 2014, c.31 (C.2A:162-15 et seq.) (2014), [https://pub.njleg.state.nj.us/Bills/2014/PL14/31\\_.PDF](https://pub.njleg.state.nj.us/Bills/2014/PL14/31_.PDF); and Attorney General Law Enforcement Directive No. 2016-6, Christopher S. Porrino, New Jersey Attorney General, October 11, 2016, 8, <https://www.nj.gov/lps/dcj/agguide/directives/2016-6-Law-Enforcement.pdf> (noting an effective date of January 1, 2017, for the “Bail Reform Law”).

## New York

2019 N.Y. Sess. Laws, Ch. 59 (S. 1509-C), Part III, amending (inter alia) N.Y. Crim. Proc. L. § 510.10. This legislation was subsequently revised within our study period and twice thereafter. See 2020 N.Y. Sess. Laws, Ch. 56 (S. 7506-B), Part UU (2020); 2022 N.Y. Sess. Laws, Ch. 56 (S. 8006-C), Part UU, Subpart B (2022); and 2023 N.Y. Sess. Laws, Ch. 56 (S. 4006-C), Part VV, Subpart A (2023). This report’s model does not account for the spring 2020 revision, for two reasons. First, it operated within the same framework established by the 2019 legislation. Second, it is not clear how many cases the change may have affected. See René Ropac and Michael Rempel, *Does New York’s Bail Reform Law Impact Recidivism? A Quasi-experimental Test in New York City*, Data Collaborative for Justice, March 2023, <https://datacollaborativeforjustice.org/work/bail-reform/does-new-yorks-bail-reform-law-impact-recidivism-a-quasi-experimental-test-in-new-york-city/> (arguing that the 2020 revisions may have successfully targeted a relatively small subset of cases for people whose rearrest rates rose after 2019). We selected an effective date of January 1, 2020, despite the partial imple-

mentation of bail reform in some courtrooms in November 2019. See Heather Yakin, “Memo: Judges Can Free Defendants Before Jan. 1 Start of Bail Reform,” *Times Herald-Record*, November 7, 2019, <https://www.recordonline.com/story/news/2019/11/08/memo-judges-can-free-defendants/2343116007/>.

**New York City.** Brooklyn and Manhattan prosecutors had already implemented some form of prosecutor-led bail reform for misdemeanor cases. See James C. McKinley Jr., “Some Prosecutors Stop Asking for Bail in Minor Cases,” *New York Times*, January 9, 2018, <https://www.nytimes.com/2018/01/09/nyregion/bail-prosecutors-new-york.html> (noting policy changes effective in Brooklyn in April 2017 and in Manhattan in January 2018). We exclude these prosecutor-led initiatives to focus on the effect of the much broader 2020 legislation.

## Ohio

In 2020 the Ohio Supreme Court adopted major changes to the state’s rules of practice and procedure, including a rewrite of Ohio Rule of Criminal Procedure 46 governing bail and pretrial detention. Effective July 1, 2020, the revision — as relevant here — directed judges to release defendants with the “least restrictive conditions” that would “reasonably assure” return to court, public safety, and integrity of the judicial process. It also made clear that monetary conditions could be imposed “to reasonably assure the defendant’s future appearance in court.” See Amendments to the Supreme Court of Ohio, Ohio Rules of Practice and Procedure (2020), 29–32, <https://www.supremecourt.ohio.gov/ruleamendments/documents/4.22.20%20Posting.pdf>. In January 2022, the Ohio Supreme Court held that this language precluded judges from setting money bail on the basis of a concern about public safety. If prosecutors believed a defendant presented a threat to public safety, they were obligated to move for detention and follow the procedures set out for those motions — not use unaffordable money bail as an end run around the process. See *DuBose v. McGuffey*, 168 Ohio St.3d 1, 2022-Ohio-8, 195 N.E.3d 951, at ¶¶ 20–25. In response, the legislature proposed an amendment to the state constitution requiring courts to consider public safety when setting bail. Sub. H.R.J. 2, 134th Gen. Assemb., Article 1, Joint Resolution (Ohio, 2022) <https://publicfiles.ohiosos.gov/free/publications/SessionLaws/134/134-HJR-002.pdf>. Voters adopted the amendment by an overwhelming margin. See “Ohio Election Results,” *New York Times*, updated December 14, 2022, <https://www.nytimes.com/interactive/2022/11/08/us/elections/results-ohio.html>. The Ohio Supreme Court voted to repeal Criminal Rule 46 to ensure compliance with the new constitutional language. See Nick Evans, “Last Year’s Cash Bail Amendment from Lawmakers Put Ohio’s Entire Pretrial Release System in Jeopardy,” *Ohio*

*Capital Journal*, May 23, 2023, <https://ohiocapitaljournal.com/2023/05/23/last-years-cash-bail-amendment-from-lawmakers-put-ohios-entire-pretrial-release-system-in-jeopardy/>. With the court's repeal due to go into effect on July 1, 2023, thereby leaving the court without consistent or uniform pretrial detention standards. Ohio approved an emergency measure in June 2023 to codify Criminal Rule 46. See H.B. 191, 135th Gen. Assemb., Reg. Sess. §1 et seq. (Ohio, 2023), <https://www.legislature.ohio.gov/legislation/135/hb191>. Also see Nick Evans, "Ohio Senate Approves Emergency Measure to Codify Bail Rules," *Ohio Capital Journal*, June 1, 2023, <https://ohiocapitaljournal.com/2023/06/01/ohio-senate-approves-emergency-measure-to-codify-bail-rules/>.

## Pennsylvania

**Philadelphia.** Philadelphia District Attorney's Office, "Larry Krasner Announces End to Cash Bail in Philadelphia for Low-Level Offenses," press release, February 21, 2018, <https://phillyda.wordpress.com/2018/02/21/larry-krasner-announces-end-to-cash-bail-in-philadelphia-for-low-level-offenses/> (noting an immediate effective date). The announcement lists the 25 charges that no longer require cash bail and "marks the first of an ongoing review of cash bail." For the March 2020 policy shift, see Philadelphia District Attorney's Office, "District Attorney Krasner Announces Acceleration of DAO Reforms in Response to COVID-19 Emergency," March 16, 2020, <https://medium.com/philadelphia-justice/district-attorney-krasner-announces-acceleration-of-dao-reforms-in-response-to-covid-19-emergency-e2340f587f25> (noting an effective date of March 17, 2020). For criticism of that reform, see Philadelphia Bail Fund, "Rhetoric vs. Reality: The Unacceptable Use of Cash Bail by the Philadelphia District Attorney's Office During the COVID-19 Pandemic," July 2020, [https://static1.squarespace.com/static/591a4fd51b10e32fb50fbc73/t/5f21f83dc3d7a32b5c7e9c09/1596061764705/PBF\\_RhetoricvsReality\\_072920.pdf](https://static1.squarespace.com/static/591a4fd51b10e32fb50fbc73/t/5f21f83dc3d7a32b5c7e9c09/1596061764705/PBF_RhetoricvsReality_072920.pdf).

## Texas

**Austin.** For court-led reforms, see C-1-CR-11-100054, Standing Order for Personal Bonds on Misdemeanor Cases in Travis County Court at Law, February 6, 2020, <https://www.traviscountytexas.gov/images/courts/Docs/ccl-standing-order-personal-bonds.pdf>. Some county officials and judges noted that the policy had little impact, as the large majority of those arrested (70 percent of all offenses) were already being released on personal bonds. See Michael King, "Travis Judges Loosen Misdemeanor Bond Requirements," *Austin Chronicle*, February 7, 2020, <https://www.austinchronicle.com/daily/news/2020-02-07/travis-judge>

[loosen-misdemeanor-bond-requirements/](https://www.traviscountytexas.gov/images/district_attorney/docs/Case_Guidelines.pdf). For prosecutor-led reforms, see Travis County District Attorney's Office, "Guidelines for the TCDA Prosecution of Cases," April 28, 2021, [https://www.traviscountytexas.gov/images/district\\_attorney/docs/Case\\_Guidelines.pdf](https://www.traviscountytexas.gov/images/district_attorney/docs/Case_Guidelines.pdf).

**Dallas.** John Creuzot, District Attorney, to the People of Dallas County, April 11, 2019, [https://www.texasobserver.org/wp-content/uploads/2019/04/Official-DACreuzot-PoliciesLetter\\_April2019.pdf](https://www.texasobserver.org/wp-content/uploads/2019/04/Official-DACreuzot-PoliciesLetter_April2019.pdf).

**Houston.** In May 2016, plaintiff Maranda Lynn O'Donnell — who was arrested for driving with an invalid license and detained when unable to afford the \$2,500 bail — filed a class action suit against Harris County alleging that the bail system violated the Equal Protection and Due Process Clauses of the United States Constitution. O'Donnell v. Harris County ("O'Donnell I"), 251 F. Supp. 3d 1052, 1062–64 (S.D. Tex. 2017), *aff'd in part*, 882 F.3d 528 (5th Cir. 2018), and *aff'd in part*, 892 F.3d 147 (5th Cir. 2018) (en banc). In April 2017, the court entered a preliminary injunction, holding that Harris County did not provide sufficient safeguards for the due process and equal protection rights of indigent people arrested for misdemeanors. See Order of Preliminary Injunction, U.S. District Court for the Southern District of Texas, Houston Division, April 28, 2017, <https://clearinghouse.net/doc/88524/>. Also see Civil Rights Litigation Clearinghouse, "Case: O'Donnell v. Harris County," accessed April 18, 2024, <https://clearinghouse.net/case/15377/> (providing full case narrative). Following extensive litigation, a consent decree was negotiated and approved in November 2019, requiring release or unsecured bail for most misdemeanor offenses and requiring individualized ability-to-pay determinations. See Consent Decree, U.S. District Court for the Southern District of Texas, Houston Division, November 21, 2019, [https://jad.harriscountytexas.gov/Portals/70/documents/ODonnell\\_Consent\\_Decree\\_CJ-TX-0010-0025.pdf](https://jad.harriscountytexas.gov/Portals/70/documents/ODonnell_Consent_Decree_CJ-TX-0010-0025.pdf). Also see O'Donnell I, 251 F. Supp. 3d at 1161–65 (describing initial preliminary injunction, to take effect May 15, 2017). Mindful of this complicated procedural history, we follow other work on Harris County in dating the effective date of misdemeanor bail reform to June 2017. See Paul Heaton, *The Effects of Misdemeanor Bail Reform*, University of Pennsylvania Quattrone Center for the Fair Administration of Justice, August 16, 2022, 7, <https://www.law.upenn.edu/institutes/quattronecenter/reports/bailreform/#/>.

## Virginia

2021 Virginia Laws 1st Sp. Sess. Ch. 337 (S.B. 1266) (2021), <https://lis.virginia.gov/cgi-bin/legp604.exe?212+ful+CHAP0337>, codified at Va. Stat. § 19.2-120 (2021).

## Washington, DC

DC Code § 23-1321 (2024), <https://code.dccouncil.gov/us/dc/council/code/sections/23-1321>. For further information, see Doyle et al., *Bail Reform: A Guide* 35–38.

# Appendix B: Literature Review

Research on the relationship between bail reform and crime trends has tended to focus on individual jurisdictions rather than to attempt, as in this report, a comparison across jurisdictions. (The two exceptions are detailed below.) Additionally, many single-jurisdiction studies are descriptive rather than causal — comparing, for example, rearrest rates before and after bail reform. Analyses focused on identifying a causal relationship between changes in bail policy and crime have emerged only recently.

In general, comparative work has yielded mixed results. However, analyses using sophisticated econometric tools — such as quasi-experimental models — have found either no relationship between bail reform and crime rates or limited increases in the latter. The latest single-jurisdiction research strives to move beyond this stalemate by distinguishing between the effects of bail reform in the aggregate and on specific types of cases.

**Multijurisdictional studies.** We are aware of two papers evaluating the impact of bail reform on public safety outcomes. One provides descriptive statistics of crime trends before and after bail reform, finding at most small changes in crime trends after reform. Notably, the authors acknowledged the need for causal research on the relationship between bail reform and crime, a gap that this study seeks to fill.<sup>60</sup> As our own analysis was being finalized, a second multi-jurisdictional study was published, by CUNY's Institute for State and Local Government. It draws on city- and case-level data to establish that there is no relationship between falling incarceration rates and crime. The paper also demonstrated low recidivism among people released pretrial.<sup>61</sup> In other words, the authors reach conclusions similar to our own, despite drawing on different data types and focusing on different outcomes.

**Chicago.** In Cook County, Illinois, a court order required judges to consider release without monetary bail and take into account a defendant's ability to pay. A 2019 study by the court system found no increase in crime following reform; this conclusion was then disputed by a 2020 study showing an increase especially in new crimes committed by people released pretrial.<sup>62</sup> But a 2021 study using more robust data found that after reform the number of people

released pretrial increased with no change in the amount of crime in Chicago in the year after the reforms.<sup>63</sup> This study also addressed the findings in the previous analyses, pointing to methodological shortcomings.<sup>64</sup>

**Houston.** In the late 2010s, Harris County, Texas, revised its misdemeanor bail practices pursuant to a consent decree. Studies of this change exemplify the dynamic described above. Government agencies looked at the effects of bail reform using simple before-and-after comparisons, coming to conflicting conclusions. For instance, an analysis by the Harris County District Attorney's Office found that misdemeanor bail reform resulted in higher recidivism and higher crime rates.<sup>65</sup> But a memo to the Harris County Commissioners Court published by the county's Justice Administration Department disagreed, noting that crime did not increase until partway through 2020, years after bail reform went into effect, suggesting that the timing of the increase in crime could have been due to other factors, such as the Covid-19 pandemic.<sup>66</sup> When economist Paul Heaton used a difference-in-differences design to study the impact of bail reform on key case metrics, however, he found that court-ordered reform increased release rates, decreased conviction rates, and did not result in an increase in future crime.<sup>67</sup>

**New Jersey.** On January 1, 2017, New Jersey shifted from a heavy reliance on monetary bail to a system based on assessments of people's risk of failing to appear in court and of being charged with a new crime if released.<sup>68</sup> A study of the aftermath of this reform found that the number of arrests decreased after the reforms, with a shift toward the use of complaint summonses.<sup>69</sup> Regular reports by the state judiciary indicate that the rate of re-arrest for those released pretrial was steady from 2017 to 2019, with an increase in rearrest rates in 2020 that the judiciary attributed to the Covid-19 pandemic. But the percentage of defendants charged with serious crimes declined, dropping below the pre-reform baseline.<sup>60</sup> More recently, a study by scholars focusing on public health found, using a synthetic control model, that bail reform in New Jersey had no effect on firearm mortality or gun violence.<sup>61</sup>

**New Mexico.** In 2017 New Mexico modified its bail practices to, among other changes, consider an individual's ability to afford bail. An analysis across six cities found that these reforms decreased the number of people ordered to pay bail. Failure to appear increased after these reforms, as did the number of offenses and violent offenses committed during pretrial release. But all increases were relatively slight, with the rate of reoffending rising just 1 percent and the rate of new violent offenses increasing from 8 percent to 9.7 percent.<sup>62</sup> The authors also noted that violent crime throughout the state rose during the period studied. Importantly, the

incidence of violent crime among those released pretrial was substantially less than the overall rate of increase in violent crime in the state, suggesting that other factors may have been at work.<sup>68</sup>

**New York.** Multiple papers have sought to study the impact of bail reform in New York on crime. Taken together, the papers suggest that bail reform may not have increased aggregate rearrests but may have increased recidivism in some types of cases. Such a finding underscores the need for precision when studying bail reform.

One of the first papers on the issue used a synthetic control model and a limited dataset covering crime in New York City through the first quarter of 2020. The authors concluded that there was no “statistically significant evidence of an increase in aggregate crime.”<sup>64</sup> Although they did find a statistically significant increase in robbery, they candidly acknowledged significant limitations related to their findings.<sup>65</sup> Another analysis used a pair of methodological approaches to conclude that though murder, larceny, and auto theft rates increased after bail reform, the increases were not, after accounting for the effects of the Covid-19 pandemic caused by bail reform.<sup>66</sup> On the contrary, the authors found that bail reform had little if any impact on crime during this time, even as total jail populations fell.<sup>67</sup>

A series of studies published by the Data Collaborative for Justice (DCJ) show more complicated results. In a pair of studies of New York City using different methodological approaches, DCJ demonstrated that eliminating the

ability to set bail for select charges — mainly misdemeanors and nonviolent felonies — was not associated with increases in rearrest rates.<sup>68</sup> However, when DCJ looked at “high-risk” individuals, namely people with a pending criminal case or recent violent arrest, there was an increase in rearrests. DCJ’s March 2023 recidivism study found this result to be statistically significant.<sup>69</sup> But its October 2023 study, which applied a different methodology, found a statistically significant increase in rearrests only for violent rearrests within the pretrial period.<sup>70</sup> Notably, an April 2024 analysis covering all of the state except New York City’s five boroughs, however, found increases in rearrests in several subsets of cases but declines among “people charged with misdemeanors and people with no recent criminal history.”<sup>71</sup>

**Philadelphia.** In 2018 the Philadelphia District Attorney’s Office implemented a new cash bail policy in which no cash bail is presumed for some enumerated charges.<sup>72</sup> A study one year later found that the release rate increased for both misdemeanors and felonies, while the recidivism rate decreased by 1 percent for misdemeanors and 2 percent for felonies.<sup>73</sup> However, a subsequent study questioned the policy’s impact. That analysis found that most of the increase in releases stemmed from a decline in requests for bail of \$5,000 or less and that the policy “had no impact on pretrial detention rates.”<sup>74</sup> Most defendants who benefited from the policy, the study found, would have posted bail or agreed to conditional release on unsecured bail.<sup>75</sup>

# Endnotes

- 1 See generally Stephanie Wylie and Ames Grawert, *Challenges to Advancing Bail Reform*, Brennan Center for Justice, April 10, 2024, 2–4, table 1, <https://www.brennancenter.org/our-work/research-reports/challenges-advancing-bail-reform>
- 2 For examples of how arguments over the relationship between bail reform and crime have affected state and national politics, see Anna Gronewold, “New York Democrats Didn’t Defend Their Bail Law Changes. It Bit Them at the Polls,” *Politico*, November 27, 2022, <https://www.politico.com/news/2022/11/27/new-york-democrats-bail-law-00070800>; and Matt Friedman and Joseph Spector, “New Jersey Overhauled Its Bail System Under Christie. Now Some Democrats Want to Roll It Back,” *Politico*, December 11, 2022, <https://www.politico.com/news/2022/12/11/new-jersey-bail-system-roll-back-00072781> (noting challenges to bipartisan bail reform in New Jersey). For a discussion of media portrayals of bail reform in New York, see Laura Bennett and Jamil Hamilton, *Freedom, Then the Press: New York Media and Bail Reform*, *fwd.us*, April 2, 2021, <https://www.fwd.us/news/new-york-media-and-bail-reform/>.
- 3 For a thorough discussion of bail reform jurisdictions that enacted rollbacks and the political dynamics surrounding bail policy, see Wylie and Grawert, *Challenges to Advancing Bail Reform*.
- 4 See, for example, René Ropac and Michael Rempel, *Does New York’s Bail Reform Law Impact Recidivism? A Quasi-experimental Test in New York City*, Data Collaborative for Justice, March 2023, <https://datacollaborativeforjustice.org/wp-content/uploads/2023/03/RecidivismReport-4.pdf> (about New York State); Paul Heaton, *The Effects of Misdemeanor Bail Reform*, University of Pennsylvania Quattrone Center, August 16, 2022, <https://www.law.upenn.edu/institutes/quattronecenter/reports/bailreform/#/> (about Harris County, Texas); and Don Stern and David Olson, *Dollars and Sense in Cook County: Examining the Impact of General Order 18.8A on Felony Bond Court Decisions, Pretrial Release, and Crime*, Loyola University Chicago, Safety and Justice Challenge, November 19, 2020, 1–2, <https://safetyandjusticechallenge.org/wp-content/uploads/2021/06/Report-Dollars-and-Sense-in-Cook-County.pdf> (about Cook County, Illinois).
- 5 See, e.g., N.Y. Crim. Proc. L. § 500.10(3-a)
- 6 Money bail was relatively uncommon before the 20th century. See, for example, *Rowley Raoul*, 2023 IL 129243, ¶ 32 (July 18, 2023) (noting the rarity of money bail in Illinois in the 19th century).
- 7 For more on the history of bail policy and its role in the criminal justice system, see Wylie and Grawert, *Challenges to Advancing Bail Reform*, 2.
- 8 We are aware of three states — Arkansas, New York, and North Dakota — where the bail inquiry remains focused on helping ensure people’s return to court. See Ark. R. Crim. P. 9.2(a) (authorizing money bail only where “no other conditions will reasonably ensure the appearance of the defendant in court”); N.Y. Crim. Proc. L. § 510.10(1) (focusing the release inquiry on whether “the principal poses a risk of flight”); and N.D.R. Crim. P. 46(a)(1) (requiring release unless it will not “reasonably assure the appearance of the person in court”). In New York, courts certainly may consider public safety factors at different phases of the bail-setting process. See N.Y. Crim. Proc. L. § 510.10(1)(a)–(i) (permitting judges to consider “the principal’s criminal conviction record” when evaluating the likelihood of flight). But in each, risk of flight — rather than a perceived public safety risk — remains the threshold question when deciding whether to impose money bail. Some other states permit judges to set release conditions based on perceived public safety risk in some cases but not all. See Wis. Stat. Ann. ch. 969.01(a)(1)–(2) (violent crimes only); and Vt. Stat. Ann. § 7553a (same). But the vast majority of states

- authorize judges to consider the protection of public safety when setting bail or imposing other conditions for release in any case. See, e.g., Cal. Pen. Code § 1275; and Mass. G. L. c. 276, § 57.
- 9 See Nick Pinto, “The Bail Trap,” *New York Times*, August 13, 2015, <https://www.nytimes.com/2015/08/16/magazine/the-bail-trap.html>.
  - 10 For a discussion of the dynamics surrounding the passage of bail reform in New York State, see Emma Whitford, “A Closer Look at Albany Democrats’ Compromise on Bail Reform,” *Gotham Gazette*, April 5, 2019, <https://www.gothamgazette.com/state/8420-a-closer-look-at-albany-democrats-compromise-on-bail-reform>. For a discussion of the role of cost containment in the push for bail reform in Alaska, see Michael A. Rosengart, “Justice Reinvestment in Alaska: The Past, Present, and Future of SB 91,” *Alaska Law Review* 34, no. 2 (2017): 245–49, <https://scholarship.law.duke.edu/cgi/viewcontent.cgi?article=1534&context=alr>. For a discussion of the role of public safety in bail reform in New Jersey, see Friedman and Spector, “New Jersey Overhauled Its Bail System”; Gov. Chris Christie, “State of the State Address (2014),” January 14, 2014, [https://www.washingtonpost.com/politics/full-text-of-new-jersey-gov-chris-christies-2014-state-of-the-state-speech/2014/01/14/8fd12f08-7d55-11e3-9556-4a4bf7bcbdb8\\_story.html](https://www.washingtonpost.com/politics/full-text-of-new-jersey-gov-chris-christies-2014-state-of-the-state-speech/2014/01/14/8fd12f08-7d55-11e3-9556-4a4bf7bcbdb8_story.html).
  - 11 See, e.g., N.Y. Crim. Proc. L. § 510.10 (limiting discretion to set money bail for most misdemeanors and lower-level felonies); P.L. 2014, c.31 (C.2A:162-15 et seq.) (2014), [https://pub.njleg.state.nj.us/Bills/2014/PL14/31\\_PDF](https://pub.njleg.state.nj.us/Bills/2014/PL14/31_PDF); S.B. 91, 29th Leg., 2d. Sess. §§ 59, 117 (Alaska 2016), <https://www.akleg.gov/basis/Bill/Text/29?Hsid=SB0091Z>, codified at Alaska Stat. § 12.30.011(b)(1) (basing release decisions on risk score as determined by a risk assessment system); and H.B. 2003, § 16, codified at Utah Code Ann. §§ 77-20-205(7)(a).
  - 12 James C. McKinley Jr., “Some Prosecutors Stop Asking for Bail in Minor Cases,” *New York Times*, January 9, 2018, <https://www.nytimes.com/2018/01/09/nyregion/bail-prosecutors-new-york.html>.
  - 13 *O’Donnell v. Harris County*, 251 F. Supp. 3d 1052, 1062–64 (S.D. Tex. 2017), *aff’d in part*, 882 F.3d 528 (5th Cir. 2018), and *aff’d in part*, 892 F.3d 147 (5th Cir. 2018) (en banc); and *In re Humphrey*, 482 P.3d 1008 (Cal. 2021).
  - 14 Wylie and Grawert, *Challenges to Advancing Bail Reform*, 8–9.
  - 15 Friedman and Spector, “New Jersey Overhauled Its Bail System”; David Cruz, “Christie Defends Bail Reform, Says New Jersey Did It the Right Way,” *NJ Spotlight News*, March 22, 2023, <https://www.njspotlightnews.org/video/christie-defends-bail-reform-says-new-jersey-did-it-the-right-way/>; and Wylie and Grawert, *Challenges to Advancing Bail Reform*, 6.
  - 16 Ames Grawert and Noah Kim, “Myths and Realities: Understanding Recent Trends in Violent Crime,” Brennan Center for Justice, updated May 9, 2023, <https://www.brennancenter.org/our-work/research-reports/myths-and-realities-understanding-recent-trends-violent-crime>; and Dan Frosch, Kris Maher, and Zusha Elinson, “Rural America Reels from Violent Crime. ‘People Lost Their Ever-Lovin’ Minds,’” *Wall Street Journal*, June 10, 2022, <https://www.wsj.com/articles/violent-crime-rural-america-homicides-pandemic-increase-11654864251>.
  - 17 Ames Grawert and Ram Subramanian, “Myth vs. Reality: Trends in Retail Theft,” Brennan Center for Justice, March 7, 2024, <https://www.brennancenter.org/our-work/research-reports/myth-vs-reality-trends-retail-theft>.
  - 18 Holmes Lybrand and Tara Subramaniam, “Fact-Checking Claims Bail Reform Is Driving Increase in Violent Crime,” *CNN*, July 7, 2021, <https://www.cnn.com/2021/07/07/politics/bail-reform-violent->

[crime-fact-check/index.html](#) (During a congressional hearing in late June, Sen. Lindsey Graham, a South Carolina Republican, suggested reforms eliminating cash bail could partially be to blame for the recent spike in crime.). This narrative was especially pronounced in New York. See Anne Gronewold, "New York Democrats Didn't Defend Their Bail Law Changes. It Bit Them at the Polls," *Politico*, November 27, 2022, <https://www.politico.com/news/2022/11/27/new-york-democrats-bail-law-00070800> ("Republicans blasted the airwaves ... with sepiatoned conjectures that the bail laws, which Democrats have tweaked twice while passing, have been responsible for rising crime."). For the limited role of data in these arguments, see Wylie and Grawert, *Challenges to Advancing Bail Reform*, 5–7.

19 Wylie and Grawert, *Challenges to Advancing Bail Reform*. For an example of critiques of prosecutors who have adopted criminal justice reform, see Ames Grawert and Lauren Brooks Eisen, "Jim Jordan's Phony Hearing Is the Real Offense," *New York Daily News*, April 16, 2023, <https://www.nydailynews.com/2023/04/16/jim-jordan-phony-hearing-is-the-real-offense-attacking-donald-trumps-prosecutor-alvin-bragg-rather-than-probing-crime-is-the-goal/>.

20 Some studies have found relatively small increases in crime after bail reforms were put in place. See René Ropac, *Does New York's Bail Reform Law Impact Recidivism?*, 28, and Stemen and Olson, *Dollars and Sense in Cook County*, 1–2 (discussing claims that Cook County bail reform led to rising crime).

21 John Roman, "Violence Is Plummeting in the US!," *External Processing*, May 4, 2024, <https://johnkroman.substack.com/p/violence-is-plummeting-in-the-us>; John Pfaff, "Two Big Thoughts About the Steep Crime Drop," *Vital City*, February 28, 2024, <https://www.vitalcitynyc.org/articles/two-big-thoughts-about-the-steep-crime-drop> (citing Roman's work); and Grawert and Kim, "Myths and Realities."

22 Kate Lisa, "NYPD Officer's Death Provokes Talks of More Bail Reform Rollbacks," *Spectrum News 1*, April 3, 2024, <https://spectrumlocalnews.com/nys/central-ny/politics/2024/04/04/nypd-officer-s-death-provokes-talks-of-more-bail-reform-rollbacks>; and "Former President Trump Holds Rally in Green Bay, Wisconsin," *CSPAN*, <https://www.c-span.org/video/?534536-1/president-trump-holds-rally-green-bay-wisconsin> (50:00).

23 One recent paper provides descriptive statistics of crime rates before and after bail reform from a series of cities, finding that "neither violent nor nonviolent crimes or charges increased markedly immediately after jurisdictions implemented bail reform." This is an important and timely insight on an urgent public policy question. However, the authors acknowledge the need for causal analyses, a gap that this paper aims to fill. Don Stemen and David Olson, *Is Bail Reform Causing an Increase in Crime?*, Harry Frank Guggenheim Foundation, January 2023, 9–10, <https://www.hfg.org/wp-content/uploads/2023/01/Bail-Reform-and-Crime.pdf>. Additionally, as this paper was being finalized, CUNY's Institute for State and Local Government released an analysis drawing on pretrial and case-level data to show, first, that there was no apparent relationship between falling pretrial incarceration rates and crime, and, second, that recidivism statistics indicated that people released pretrial were not driving changes in crime rates. Sara Khan, Emily West, and Stephanie Rosoff, *Lowering Jail Populations Safely Before, During, and After COVID-19*, CUNY Institute for State and Local Government, 2024, <https://safetyandjusticechallenge.org/wp-content/uploads/2024/07/Lowering-Jail-Populations-Safety-Before-During-and-After-COVID-19-Full-Report-July-2024.pdf>. This complementary approach to the question of pretrial reform reinforces our own conclusions. If recidivism is rare among people released pretrial, we would not expect reforms related to pretrial release to have a significant impact on crime rates.

24 One line of research suggests a need for further analysis on how bail reform affects outcomes in work involving defendants with a recent, prior criminal history. See Stephen Knoppel and René Ropac, *Examining the System-Wide Effect of Eliminating Bail in New*

*York City: A Controlled-Interrupted Time Series Study*, Data Collaborative for Justice at John Jay College, October 2023, 19, [https://datacollaborativeforjustice.org/wp-content/uploads/2023/10/cits\\_final.pdf](https://datacollaborativeforjustice.org/wp-content/uploads/2023/10/cits_final.pdf). For other research, see Heaton, *The Effects of Misdemeanor Bail Reform*, 39–43.

25 Reform jurisdictions (20) were: Atlanta, GA; Austin, TX; Baltimore, MD; Boston, MA; Buffalo, NY; Chicago, IL; Cincinnati, OH; Colorado Springs, CO; Dallas, TX; Denver, CO; Houston, TX; Kansas City, MO; Los Angeles, CA; New York, NY; Newark, NJ; Philadelphia, PA; Sacramento, CA; San Francisco, CA; St. Louis, MO; and Virginia Beach, VA. Control jurisdictions (10) were: Detroit, MI; Memphis, TN; Mesa, AZ; Milwaukee, WI; Nashville, TN; New Orleans, LA; Phoenix, AZ; Raleigh, NC; Seattle, WA; and Tucson, AZ. Two other jurisdictions — Louisville, KY, and Washington, DC — feature bail reforms that went into effect before our study period and were considered treated for some analyses. Another — Portland, OR — adopted reforms after the study period and is not considered a reform jurisdiction during our study period. For sources, see the methodological supplement.

26 In nearly all cases, crime data was obtained from open data sources maintained by researchers or police agencies. One notable exception is the data for Newark, New Jersey. During data collection we could find no publicly available data on crime in New Jersey cities, at least not covering the entirety of our study period. Because New Jersey significantly reworked its bail system in 2017, though, we felt that it would be an oversight not to include at least one city from the Garden State. After filing open records requests with police departments in New Jersey's largest cities, we were ultimately able to acquire data from Newark.

27 "Offense Definitions," *Crime in the United States — 2019*, Federal Bureau of Investigation, accessed April 20, 2024, <https://ucr.fbi.gov/crime-in-the-u.s/2019/crime-in-the-u.s.-2019/topic-pages/offense-definitions>. Arson is technically a Part I offense but is excluded in most if not all discussions of national crime trends. We follow the lead of other researchers and exclude it here too. See Ernesto Lopez, Richard Rosenfeld, and Bobby Boxerman, "Crime Trends in U.S. Cities: Mid-Year 2023 Update," Council on Criminal Justice, July 2023, <https://counciloncj.org/mid-year-2023-crime-trends/>. Rape is also excluded from this report, as many cities in this sample did not report counts of this offense.

28 For example, the FBI does not include embezzlement in its definition of larceny. Federal Bureau of Investigation, *Summary Reporting System (SRS) User Manual* 46–47 (2013) (on file with the authors). That rule was then applied across cities to ensure offenses were counted similarly between them.

29 As discussed in the methodological supplement, the FBI's definition of larceny encompasses any theft, therefore sweeping in lower-level thefts likely to be misdemeanors under local law.

30 The authors were guided by two previous studies that also collected state and local bail reforms: Isabella Jorgensen and Sandra Susan Smith, *The Current State of Bail Reform in the United States: Results of a Landscape Analysis of Bail Reforms Across All 50 States*, Harvard Kennedy School Faculty Research Working Paper Series RWP21-033, December 2021, <https://www.hks.harvard.edu/publications/current-state-bail-reform-united-states-results-landscape-analysis-bail-reforms-across>; and Stemen and Olson, *Is Bail Reform Causing an Increase in Crime?*. Because we supplemented the analysis in those two reports with further research, details and effective dates may differ.

31 See *In re Humphrey*, 482 P.3d 1008 (Cal. 2021); and "In re Humphrey: California Supreme Court Holds Detention Solely Because of Inability to Pay Bail Unconstitutional," *Harvard Law Review* 135, no. 3 (January 2022): 912, <https://harvardlawreview.org/print/vol-135/in-re-humphrey>.

32 Heaton, *The Effects of Misdemeanor Bail Reform*, 39–43.

33 See Aurélie Ouss and Megan T. Stevenson, "Does Cash Bail Deter Misconduct?," *American Economic Journal: Applied Economics*

15, no. 3 (July 2023): 13–15, [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3335138](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3335138). Such reforms may fall short even when implemented with the best of intentions, due to the complexity of bail policy and the many stakeholders involved. See Wylie and Grawert, *Challenges to Advancing Bail Reform*, 9–10.

34 See New Jersey Courts, *Report of the Reconvened Joint Committee on Criminal Justice*, 2023, <https://www.njcourts.gov/sites/default/files/courts/criminal/criminal-justice-reform/reconvenedcommreport.pdf> (noting the state's post-reform reductions in detention of people accused of lower-level offenses and an especially pronounced decline in detention of those unable to post bail); Heaton, *The Effects of Misdemeanor Bail Reform* (finding statistically significant reductions in detention of individuals after misdemeanor bail reform in Harris County, Texas); New York State Division of Criminal Justice Services, *Supplemental Pretrial Release Data Summary Analysis: 2019–2021*, September 21, 2022, 10–11, <https://www.criminaljustice.ny.gov/crimnet/ojsa/pretrial-release/FINAL%20DCJS%20Public%20Briefing%20on%20Supplemental%20Pretrial%20Release%20Data%209-21-22.pdf> (identifying post-reform drops in bail-setting in New York State and increases in the reliance on less restrictive release conditions, such as pretrial supervision), and Sterten and Olson, *Dangers and Sense in Cook County*, 2 (spotlighting an increase in personal recognizance bonds and pretrial release in Cook County, Illinois, after a county court–led bail reform initiative).

35 Examples of other policy analyses using difference-in-differences estimation include but are not limited to Goltzkin Goltz and Mariyana Zapryanova, “The Effect of Medicaid on Recidivism: Evidence from Medicaid Suspension and Termination Policies,” *Southern Economic Journal* 89, no. 2 (2022): 326–72, <https://onlinelibrary.wiley.com/doi/abs/10.1002/soej.12600>; Amanda Agar, Jennifer Doleac, and Anna Harvey, “Prosecutorial Reform and Local Crime Rates,” Law & Economics Center at George Mason University Scalia Law School Research Paper Series No. 22-011, 2022, [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3952764](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3952764); Daniel Shoag and Stan Veuger, “Ban-the-Box Measures Help High-Crime Neighborhoods,” *Journal of Law and Economics* 64, no. 1 (2021): 85–105, <https://www.journals.uchicago.edu/doi/abs/10.1086/711367>; and Terry-Ann Craigie, “Ban the Box, Convictions, and Public Employment,” *Economic Inquiry* 58, no. 1 (2020): 425–45, [https://www.researchgate.net/publication/335548082\\_BAN\\_THE\\_BOX\\_CONVICTIONS\\_AND\\_PUBLIC\\_EMPLOYMENT](https://www.researchgate.net/publication/335548082_BAN_THE_BOX_CONVICTIONS_AND_PUBLIC_EMPLOYMENT).

36 Clément de Chassemarin and Xavier D'Haultfoeuille, “Difference-in-Differences Estimation and Inter-temporal Treatment Effects,” *Review of Economics and Statistics* (forthcoming), 1–45, [https://direct.mit.edu/rest/article-abstract/doi/10.1162/rest\\_a\\_01414/119488-Difference-in-Differences-Estimators-of-Similar-results-can-be-found-in-specifications-using-the-estimator-introduced-by-Callaway-and-Sant-Anna-which-also-accounts-for-staggered-policy-adoption-See-Brantly-Callaway-and-Pedro-H.-C.-Sant-Anna-‘‘Difference-in-Differences-with-Multiple-Time-Periods.’’](https://direct.mit.edu/rest/article-abstract/doi/10.1162/rest_a_01414/119488-Difference-in-Differences-Estimators-of-Similar-results-can-be-found-in-specifications-using-the-estimator-introduced-by-Callaway-and-Sant-Anna-which-also-accounts-for-staggered-policy-adoption-See-Brantly-Callaway-and-Pedro-H.-C.-Sant-Anna-‘‘Difference-in-Differences-with-Multiple-Time-Periods.’’) Similar results can be found in specifications using the estimator introduced by Callaway and Sant’Anna, which also accounts for staggered policy adoption. See Brantly Callaway and Pedro H. C. Sant’Anna, “Difference in Differences with Multiple Time Periods,” *Journal of Econometrics* 225, no. 2 (2021): 200–230, <https://www.sciencedirect.com/science/article/abs/pii/S0304407620303948>.

37 The control variables were median household income, percentage Black population, percentage Hispanic population, starting month of Covid-19 lockdown, lockdown period, an indicator of the results of the most recent presidential election, crime type, an indicator for whether the jurisdiction has an above average number of officers per capita, and city and year-month fixed effects.

38 In other words, controlling for these policies introduced a collinearity problem. For an example of a decline-to-prosecute policy and its effects on crime, see Amanda Agar, Jennifer Doleac, and Anna Harvey, “Misdemeanor Prosecution,” *Quarterly Journal of Economics* 138, no. 3 (2023): 1453–1505, <https://academic.oup.com/qje/article-abstract/138/3/1453/6998589?redirectedFrom=fulltext>.

39 Our results for index crime and larceny rates passed the parallel trends test previously discussed. However, the violent crime rates

model failed the parallel trends test. But models that violate the parallel trends assumption can still be probative. In our case, reform jurisdictions had greater drops in crime before changes to bail policy went into effect, compared with cities without reform at that time. While complicating any effort to demonstrate any causal effect of bail reform on violent crime, these differences remain consistent with our finding that there is no systematic evidence of a relationship between bail reform and crime. Indeed, if anything this violation of the parallel trends assumption suggests there are systematic differences between reform and non-reform jurisdictions, reinforcing the idea that bail reform is an unlikely explanation for crime in these jurisdictions. For a further discussion of our evaluation of the significance of parallel trends violations, see the methodological supplement.

40 The FBI also defines rape as a violent crime. As discussed above, however, the offense was excluded from this report’s dataset due to data quality concerns.

41 This approach ensures a clean comparison but results in changes to the sample size for each analysis, differences that are apparent in the tables provided with the methodological supplement.

42 To our knowledge, no such long-term research has been undertaken to date, likely due in part to the relative recency of major reforms. Simply put, more time and data may be needed to do this work. However, it is worth noting that research by the Data Collaborative for Justice has consistently found reductions in recidivism in cases involving lower-level offenses even over the short term. See, for example, Ropac and Rempel, *Does New York’s Bail Reform Law Impact Recidivism?*

43 See, e.g., Hena Rafiq, Christi Economy, and Lindsay Graef, *Building a Responsive Pretrial Supervision System in Harris County, Texas*, Harvard Kennedy School Government Performance Lab, 2023, [https://govlab.hks.harvard.edu/sites/hwp.harvard.edu/files/govlabs/files/harris\\_co\\_pretrial\\_project\\_feature.pdf?m=1673371592](https://govlab.hks.harvard.edu/sites/hwp.harvard.edu/files/govlabs/files/harris_co_pretrial_project_feature.pdf?m=1673371592) (detailing the expansion of pretrial supervision in Harris County and efforts to scale the service). Also see Matt Katz, “NYC’s Supervised Release Program Swelled After Bail Reform. Now It May Be Overwhelmed,” *Gothamist*, June 21, 2023, <https://gothamist.com/news/nycs-supervised-release-program-swelled-after-bail-reform-now-it-may-be-overwhelmed> (describing challenges with expanding supervision to accommodate post-reform needs); and Joshua Solomon, “Underfunded ‘Supervised Release’ Programs in NY Struggle to Keep Up,” *Times Union*, August 14, 2022, <https://www.timesunion.com/state/article/Supervised-release-programs-struggling-to-keep-17370332.php> (same). For a critique of expanded pretrial supervision and the phenomenon of “net widening” in which judges respond to the creation of pretrial service programs by directing people to them who would have previously been released without conditions, see Wylie and Grawert, *Challenges in Advancing Bail Reform*, 10.

44 For discussions of the collateral consequences of jail detention, see Will Dobbie et al., “The Economic Costs of Pretrial Detention,” Brookings, March 24, 2021, <https://www.brookings.edu/articles/the-economic-costs-of-pretrial-detention/>; and Nick Pinto, “The Bail Trap,” *New York Times*, August 13, 2015, <https://www.nytimes.com/2015/08/16/magazine/the-bail-trap.html> (discussing custody costs and other repercussions of incarceration). For research on how pretrial detention may increase future involvement in the criminal justice system, see Core Correctional Solutions, “The Hidden Costs of Pretrial Detention Revisited,” March 21, 2022, <https://craftmediabucket.s3.amazonaws.com/uploads/HiddenCosts.pdf>. For the way collateral consequences work to exclude people from civil society, see Cameron Kimble and Ames Grawert, “Collateral Consequences and the Enduring Nature of Punishment,” in *Excessive Punishment: How the Justice System Creates Mass Incarceration*, ed. Lauren-Brooke Eisen (New York: Columbia University Press, 2024), 243–52.

45 Wylie and Grawert, *Challenges in Advancing Bail Reform*, 8–10.

46 Ames Grawert, “Analyzing the FBI’s National Crime Data on

2022 — with an Eye Toward 2023 Trends. Brennan Center for Justice, October 18, 2023, <https://www.brennancenter.org/our-work/analysis-opinion/analyzing-fbis-national-crime-data-2022-eye-toward-2023-trends>.

47 For a list of some of those conditions, based on a survey of national trends, see Grawert and Krip, "Myths and Realities."

48 Josephine Wan, Li Habb, Sam Subramanian, and Tiffany Sanabia, *Improving Misdemeanor Enforcement*, Brennan Center for Justice, March 21, 2024, <https://www.brennancenter.org/our-work/research-reports/improving-misdemeanor-enforcement>.

49 Wylie and Grawert, *Challenges in Achieving Bail Reform*, 9–10.

50 Stemen and Olson, *Is Bail Reform Causing an Increase in Crime?*, 9–10.

51 Khan, West, and Rosoff, *Lowering Jail Populations Safely Before, During, and After COVID-19*.

52 Paul G. Cassell and Richard Fowles, "Does Bail Reform Increase Crime? An Empirical Assessment of the Public Safety Implications of Bail Reform in Cook County, Illinois," *Wake Forest Law Review* 55 (2020): 957–62 (disputing the results of the 2019 study by the Office of the Chief Judge of the Cook County Courts). For an early draft of this paper, see Paul G. Cassell and Richard Fowles, "Does Bail Reform Increase Crime? An Empirical Assessment of the Public Safety Implications of Bail Reform in Cook County, Illinois," University of Utah College of Law, Research Paper No. 345, February 2020, <https://dc.law.utah.edu/scholarship/194/>.

53 Stemen and Olson, *Dollars and Sense in Cook County*, 2.

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